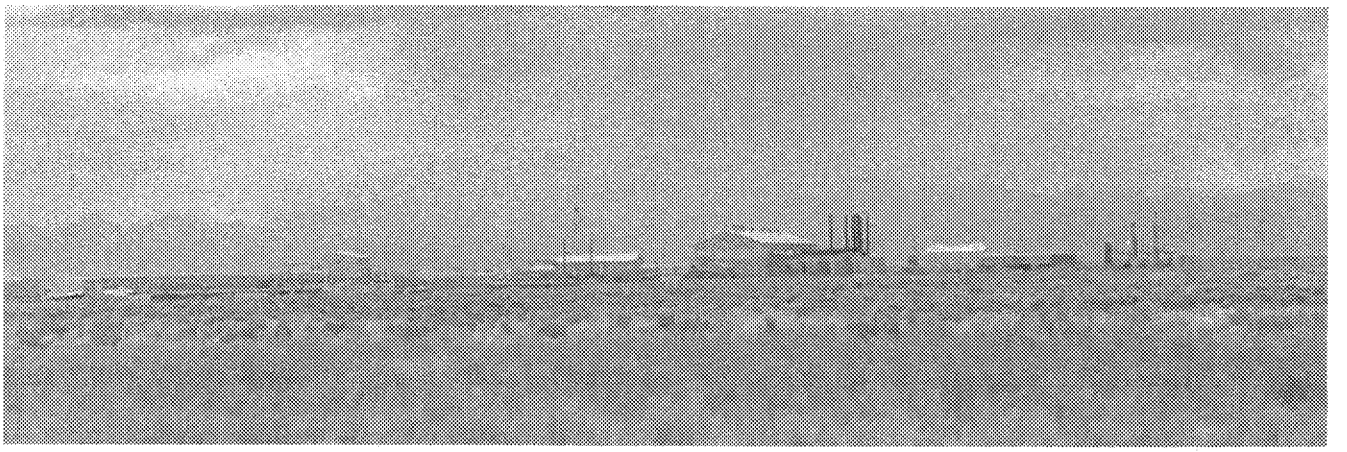
WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY
Air Quality Division
Inspection Report
for
Enterprise Jonah Gas Gathering Company LLC
Luman Compressor Station

FY – 2018



Facility Information				
Company	Enterprise Jonah Gas Gathering Company LLC		**AFS:** 5663500034	
Facility	Luman Compressor Station		**Facility ID:** F003721	
Mailing Address	1100 Louisiana St. **City:** Houston		**State:** TX **Zip:** 77002	
Facility Location	Lat/Long: 42.392861/-109.75335			
Process Type	Natural Gas Compression Station			
Facility Class	Major			
Operating Permit	P0021927 **Issued:** 1/3/2017		**Expiration Date:** 1/3/2022	
Responsible Official	Ivan Zirbes		**Telephone:** (713) 381-6500	
Inspection Information				
Inspection Date	February 14, 2018 **Previous Inspection Date:** July 19, 2017			
Company Representative(s)	Brian Stone, Environmental Manager; Jim Pilon, Senior Field Environmental Scientist; Patrick Abbot, Senior Environmental Scientist; Ray Pape, Operations Supervisor; Jordan Kowert, Operations Tech			
	Name	**Title/Position**	**Initial**	**Date**
WAQD Inspector	Cindi Etcheverry	Air Quality Specialist	CE	6/27/2018
WAQD Staff Review	Jeff Wendt	District 5 Engineer	JW	7/16/2018
	Lars Lone	Compliance Program Manager	LL	7/26/18
	Nancy Vehr	Administrator	NV	7/30/18
Compliance Status	This facility was found to be operating in compliance with applicable Wyoming Air Quality Standards and Regulations.			

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AIR QUALITY CONCERNS

No air quality concerns were noted.

INSPECTION SUMMARY

The associated inspection identification in IMPACT is INSP006875.

This was an announced and scheduled air quality compliance inspection of the Luman Compressor Station, owned and operated by Enterprise Jonah Gas Gathering Company LLC (Enterprise) The facility was inspected February 14, 2018. Enterprise was represented by Brian Stone, Environmental Manager; Jim Pilon, Senior Field Environmental Scientist; Pat Abbot, Senior Field Environmental Scientist; Ray Pape, Operations Supervisor; Elmer Eaker, Operations Supervisor; and Jordan Kowart, Operations Technician.

Wyoming Department of Environmental Quality, Air Quality Division was represented by Cindi Etcheverry, Air Quality Specialist in the Pinedale Field Office. The permit review was scheduled for 8:30 am February 14, 2018 at the Enterprise office in Sand Draw in Boulder, Wyoming. Permit review and facility inspection occurred on the same day. Inspection of the Luman Compressor Station consisted of a records review, permit conditions review, and facility inspection. Records from the Divisions' IMPACT system were reviewed prior to the inspection. Records that are required to be maintained at the facility were observed during the facility inspection. The permit was reviewed prior to the facility inspection and reviewed with facility representative(s) during the facility inspection.

- **RECORD REVIEW.** The facility identification number is F003721. Wyoming Air Quality /Division records were reviewed from July 20, 2017 through February 14, 2018 to obtain historical information concerning previous air quality concerns, complaints, State enforcement actions, and new permits. No previous or recent issues were noted during the records review.

- **OPERATING PERMIT REVIEW.** Operating permit P0021927, issued September 11, 2017 and NSR permit P0022728 issued May 9, 2017, was evaluated for compliance during this inspection period. Previous issues noted in INSP006318 conducted July 19, 2017 were also evaluated for compliance. Those issues are summarized below in the inspection history and have been resolved. No recent operating permit issues were noted during this review.

- **FACILITY INSPECTION.** The facility inspection consisted of confirmation of equipment at the facility, visible emission observations, and compliance with permit conditions. No previous or recent issues were noted during the facility inspection.

Facility Description Process

This facility is a major source as defined by Chapter 6, Section 3 (Title V) of the Wyoming Air Quality Standards and Regulations (WAQSR).

The Luman Compressor Station gathers and compressed natural gas. Field gas is transported to the facility through four (4) trunk lines that enter the facility at pig receivers. This gas is fed to slug catchers and then fed to the main compression equipment. Gas discharges from compression to trunk line that transports gas to the Jonah Pioneer Plant. No gas dehydration occurs at the Luman Compressor Station.

Pipeline liquids are separated from the inlet gas streams by a series of slug catcher and inlet separators. The liquids from the inlet vessels as well as from the Luman Compressor Station, can be processed through a flash tank and stabilization tower. Vapors from the liquid stabilization process can be recovered through the vapor recovery unit (VRU) to reenter the facility gas stream. However, these are not in use at this time. The VRU is currently not in operation and at this time is blinded off because the volume of vapors is not sufficient to operate the VRU. The VRU will remain in place in the event that the volume of vapors is sufficent to operate the VRU. Stabilized liquids are to be transferred to the pressurized horizontal storage vessels where they will be held until removed from the facility via tanker truck. The pressurized tanks have a continuous flow to keep oxygen from getting into the tank, so there is always a small stream of vapors running into the tanks. Vapors from the pressurized tanks are sent to the combustor. Installation of the pressurized storage vessels allow for better control of liquid flashing emissions and help to prevent excess emission events during period of high pipeline liquid receipt.

RECORDS REVIEW

Records were reviewed from July 20, 2017 through February 14, 2018. Enterprise is providing records and communications as Falcon Compressor Station, and is not submitting records through IMPACT. All pertinent records provided to the Division are placed into Falcon Compressor Station (F002344) in IMPACT for this facility.

Inspection History

INSP006318 – July 19, 2017. Three (3) issues were noted during review of permit conditions.

1. **Concern**: In accordance with condition F23 of operating permit P0021927, Greenhouse Gas reports are to be submitted electronically to the Environmental Protection Agency (EPA) annually. Reports shall be submitted to the Division within sixty (60) days of submission to EPA. Greenhouse Gas reports were not submitted.
   Corrective Action: In response to this oversight, Enterprise provided Greenhouse Gas reports in CRPT023288, for previous reporting years 2014 through 2016.

2. **Concern**: In accordance with condition 37 of NSR permit P0022728, ENG008 (VRU), shall be blinded off within ninety (90) days of permit issuance. Written

notification is to be submitted within fifteen (15) days of blinding off the VRU compressor engine. P0022728 was issued May 9, 2017. As of August 28, 2017 the VRU has not been blinded off and written notification of blinding off the VRU has not been submitted to the Division.
Corrective Action: In response to this oversight, in the report CRPT02328 received August 28, 2017, Enterprise permanently took the VRU out of service by locking it out on August 8, 2017, the final blind installation occurred August 23, 2017.

3. **Concern**: In accordance with condition C1 (xiii), Compliance Certification, the permittee shall assess compliance with condition F23 by verifying that Greenhouse Gas reports are submitted to the Division within sixty (60) of submission to EPA. Operator indicated continuous compliance with this condition, however, Greenhouse Gas reports were not submitted to the Division.
Corrective Action: In response to this oversight, Enterprise provided Greenhouse Gas reports for previous reporting years 2014 through 2016. Accurate Compliance Certifications will be provided.

Compliance Report History
Compliance report history in IMPACT from July 20, 2017 through February 14, 2018.

CRPR027063 – February 5, 2018. 2017 annual fugitive equipment leak VOC emissions report.

CRPT026784 – January 29, 2018. 2017 second semiannual 40 CFR 60 Subpart KKK LDAR.

CRPT026775 – January 29, 2018. 2017 second semiannual monitoring report.

CRPT026774 – January 29, 2018. 2017 annual Compliance Certification report.

CRPT026561 – January 25, 2018. 2017 second semiannual 40 CFR 60 Subpart Kb report.

CRPT026497 – January 22, 2018. 2018 annual 15-day notification of engine testing and protocol.

CRPT026404 – January 22, 2018. 2017 second semiannual 40 CFR 63 Subpart ZZZZ report.

CRPT025181 – January 20, 2018. 2017 notification of unavoidable equipment malfunction.

CRPT023288 – August 28, 2017. 2016 annual Greenhouse Gas report for 2016, 2015, and 2014.

CRPT023281 – August 28, 2017. 2017 notification of VRU taken out of service and disconnected.

CRPT022924 – July 31, 2017. 2017 first stemiannual 40 CFR Part 63 Subpart ZZZZ report.

CRPT022862 – July 31, 2017. 2017 first semiannual Monitoring and Deviation report.

CRPT022840 – July 24, 2017. 2017 first semiannual 40 CFR 60 Subpart KKK LDAR report.

CRPT022838 - July 24, 2017. 2017 first semiannual 40 CFR 60 Subpart Kb report.

Site Visit History
Site visit history in IMPACT from July 20, 2017 through February 14, 2018.

SITE002353 – January 30, 2018. Drive by observation by Jon Walker.

Correspondence History
Correspondence history in IMPACT from July 20, 2017 through February 14, 2018.

COR063587 – November 10, 2017. ESD reported, follow-up will be provided.

Permit and Waiver History
All permits are listed to document the permitting history.
* Permit incorporated into existing Operating Permit
** Obsolete, expired, or superseded permits.

P0022728 5/9/2017 ACTIVE
NSR permit to modify the Luman Compressor Station by removing the VRU engine and reclassifying the existing emergency flare to a process flare. The Luman Compressor Station is located in the NW1/4 of Section 24, T28N, R109W, approximately twenty-one (21) miles east-southeast of Big Piney, in Sublette County, Wyoming. A Chapter 6, Section 2(c)(ii) demonstration in accordance with the Division's Interim Policy has been conducted. Emission offset requirements, if applicable; have been applied to this permitting action at a ratio of 1.5:1.0 for VOCs and 1.1:1.0 for NOx. Permitting actions to date, including this application, have resulted in a decrease in NOx emissions of 4.6 tpy and a decrease in VOC emissions of 73.2 tpy. Therefore, Enterprise Jonah Gas Gathering Company, LLC has met the offset requirements for NOx and VOC.

P0021927 1/3/2017 ACTIVE
Title V Permit Renewal. Permitted emission sources at the facility include six 3,668 hp Caterpillar G3612LE compressor engines (units ENG001, ENG002, ENG003, ENG006, ENG010 and ENG012), two 637 hp Caterpillar G3412CLE generator engines (units ENG009 and ENG011), one 14 hp Onan emergency generator (unit ENG005), one 1.706 MMBtu/hr stabilizer heater (unit HET001), one 1.584 MMBtu/hr fuel gas heater (unit HET002), an emergency flare (unit FLR002), a 400 MSCFD combustion chamber (unit FLR001/FLA001) to control flash emissions from the three 1,000 bbl horizontal storage tanks (unit TNK001), pneumatic controllers (unit PNE001), condensate loading operations (unit LUD001), compressors blowdown activities (unit BVC001) and fugitives (units FUG001, FUG003 and FUG004). Other storage tanks at the facility do not have any applicable requirements based on their size. Each Caterpillar engine is equipped with an oxidation catalyst. The 245 hp Caterpillar G3406TA engine associated with the VRU system, (unit ENG008), was removed on January 26, 2015 and replaced with an electric driven compressor. The compressor station is a major source for NO_X, VOC and HAP emissions.

P0007454 7/9/2013 SUPERSEDED
* MD-14216 to update the component count in vapor and liquid service specified the calculation of fugitive VOC emissions and reporting, adjusted the testing frequency and set annual operating hour limits for the Caterpillar generator engines (units ENG009 and ENG011). This permit superseded the following conditions of permit MD-11559 and implemented updated requirements for the same: condition 18 for periodic testing requirements on all compressor engines and the combustion chamber; condition 33 regarding annual reporting of actual fugitive VOC emissions; condition 37 regarding annual operating hour limits for the generator engines (units ENG009 and

ENG011). Additional permit requirements include: annual testing for NO_X, CO and VOC for all compressor engines (units ENG001, ENG002, ENG003, ENG006, ENG010 and ENG012); testing every three years for NO_X, CO and VOC for the generators (units ENG009 and ENG011); concurrently testing for formaldehyde or CO reduction per 40 CFR §63.6615 for all Caterpillar engines; annual testing for NO_X, CO and VOC for the combustion chamber (unit FLR001/FLA001); test notification and retesting if any engine or combustion chamber tests outside the permitted limits.

P0010658 8/27/2012 EXPIRED
** wv-13656 to extend the operation of two (2) 637 hp Caterpillar G3412CLE backup engines (G3-G4) for an additional 1,000 hours (2,000 hours total) during the 2012 calendar year at the Luman Compressor Station.

P0002236 12/9/2011 SUPERSEDED
* MD-11559 to modify the Luman Compressor Station. This permit superseded all previous Chapter 6 Section 2 Air Quality permits and waivers issued for the Luman Compressor Station. This permit authorized replacement of five 400 bbl condensate storage tanks with three 1,000 bbl horizontal pressurized condensate storage tanks (T1-T3); revising the stabilizer heater (H1) capacity to 1.706 MMBtu/hr and the fuel gas heater (H2) capacity to 1.584 MMBtu/hr; for an existing 14 hp Onan 7.5 JB emergency generator to be fired with natural gas or propane fuel; modifying the performance testing requirements for the Caterpillar G3406TA (VRU) engine; removing existing combustors and installing new TCI 4000 combustion chamber (CU-1); authorizing pigging activities and updating facility emissions. Permit requirements include: NO_X, CO, VOC emission limits and VOC mass content distraction efficiency for the combustion chamber (CU1); NO_X, CO, VOC and formaldehyde limits for Caterpillar engines C1-C6 and G3-G4; NO_X, CO, and VOC limits for the VRU compressor; catalyst monitoring and maintenance for all Caterpillar engines, including installation of a thermocouple to measure the inlet catalyst temperature, and installation of a device to measure pressure drop across the catalyst; engines C1-C6, G3 and G4 have to comply with the emissions limitation in 40 CFR 63 §63.6600 of CO emissions reduction by 93%, or a formaldehyde emissions limit of 14 ppmvd @ 15% oxygen; compressor engines starter replacement conditions; distance piece vent VOC emission rate limits and quarterly testing; combustion chamber and emergency flare monitoring including installing a thermocouple and a continuous recording device (or equivalent) to detect the presence of the pilot flame; annual operating hours limit and maintenance for Onan emergency generator. The permittee is required to utilize a Leak Detection and Repair (LDAR) program following 40 CFR Part 60 Subpart KKK. All equipment authorized by MD-11559 has been started-up and performance tested, as required.

P0021664 6/6/2006 SUPERSEDED
** wv-4815, authorized propane in addition to natural gas to power the Onan 7.5 JB emergency generator.

P0014761 2/15/2006 SUPERSEDED
** 3-0-208 issued February 15, 2006, expired February 15, 2011. Incorporated all previously issued permits and waivers for the Luman Compressor Station.

P0019627 7/26/2005 EXPIRED
** MD-1192 to modify operations at Luman Compressor Station with the addition of two (2) 3,668 hp Caterpillar G3612LE engines. These two (2) 3,668 hp Caterpillar G3612LE engines were never constructed, however, so this permit is not applicable.

P0019081 6/1/2004 SUPERSEDED
** MD-1000 to modify operations at Luman Compressor Station with the addition a 3668 hp Caterpillar G3612LE engine, a 637 hp Caterpillar G3412CLE generator engine, to revise the size of the Hot Oil Heater to 3.8 MMBtu/hr, to revise the size of the Caterpillar G3412 generator engine permitted under MD-921 to 637 horsepower, and to add a 0.25 MMBtu/hr fuel gas heater.

P0021663 9/3/2003 SUPERSEDED
** MD-921 to modify operations at the facility for the addition of one 3668 hp Caterpillar G3612LE engine and one 600 hp Caterpillar G3412TA engine. This permit supersedes all previous permits and waivers.

P0017665 2/21/2002 SUPERSEDED
** MD-714 for the addition of two (2) condensate tanks, one (1) combustion unit, and one condensate stabilizer.

P0016248 6/20/2000 SUPERSEDED
** MD-485 to add one 2935 hp Caterpillar G3612LE engine and increase CO emissions for the existing three compressor engines.

P0015897 7/26/1999 SUPERSEDED
** MD-413 to modify CT-1423 by removing condition 15 and allowing the Yellow Point Compressor Station to continue operation and construct a second 215 hp Caterpillar G3306TA generator and a 14 hp Onan 7.5JB emergency generator.

P0011485 5/25/1999 SUPERSEDED
** AP-JB9 to construct the new compressor station. Construct one (1)-215 Hp (site rated) Caterpillar G3306TA SCAC generator (2.0 g/hp-hr NOx) and one (1)-14 Hp (site rated) Onan 7.5 JB emergency generator (7.0 g/hp-hr NOx).

** CT-1423 10/16/98 SUPERSEDED
Allowed construction of the compressor station, which included three compressor engines, three storage tanks, and a combustion unit. The CO emission limits for the engines were corrected.

OPERATING PERMIT REVIEW

The Luman Compressor Station is operating under Title V permit number P0021927 and NSR permit P0022728. P0021927 was issued January 3, 2017 and P0022728 was issued May 9, 2017. P0021927 and P0022728 were evaluated for compliance with permit conditions as part of this inspection. The facility is subject to applicable requirements from WAQSR Ch. 8, Sec 6 - *Upper Green River Basin permit by rule for existing sources.*

Facility Emission Unit Summary

This table may not include any or all insignificant activities at this facility. The IMPACT ID's in the below table reflect the IMPACT facility inventory on April 10, 2017.

Company ID	IMPACT ID	Type	DESCRIPTION	CH 6, SEC 2 PERMITS
C1	ENG001	EU	3,668 hp Caterpillar G3612LE (4SLB) Compressor Engine	MD-11559, MD-14216
	OXI001	CE	Oxidation Catalyst	
C2	ENG002	EU	3,668 hp Caterpillar G3612LE (4SLB) Compressor Engine	MD-11559, MD-14216
	OXI002	CE	Oxidation Catalyst	
C3	ENG003	EU	3,668 hp Caterpillar G3612LE (4SLB) Compressor Engine	MD-11559, MD-14216
	OXI003	CE	Oxidation Catalyst	
C4	ENG006	EU	3,668 hp Caterpillar G3612LE (4SLB) Compressor Engine	MD-11559, MD-14216
	OXI004	CE	Oxidation Catalyst	
C5	ENG010	EU	3,668 hp Caterpillar G3612LE (4SLB) Compressor Engine	MD-11559, MD-14216
	OXI005	CE	Oxidation Catalyst	
C6	ENG012	EU	3,668 hp Caterpillar G3612LE (4SLB) Compressor Engine	MD-11559, MD-14216
	OXI006	CE	Oxidation Catalyst	
G3	ENG009	EU	637 hp Caterpillar G3412CLE (4SLB) Generator Engine	MD-11559, MD-14216
	OXI007	CE	Oxidation Catalyst	
G4	ENG011	EU	637 hp Caterpillar G3412CLE (4SLB) Generator Engine	MD-11559, MD-14216
	OXI008	CE	Oxidation Catalyst	
VRU	N/A	N/A	VRU Compressor (Electric Driven)	MD-11559
Emerg	ENG005	EU	14 hp Onan 7.5 JB Emergency Generator	MD-11559
CU-1	FLR001	EU	400 MSCFD TCI 4000 Combustion Chamber Flare Pilot	MD-11559, MD-14216
	FLA001	CE	TCI 4000 Combustion Chamber Flare	
EF-1	FLR002	EU	55 MMscf/yr Emergency Flare	MD-11559
H1	HET001	EU	1.706 MMBtu/hr Stabilizer Heater (indirect heat)	MD-11559

Company ID	IMPACT ID	Type	DESCRIPTION	CH 6, SEC 2 PERMITS
H2	HET002	EU	1.584 MMBtu/hr Fuel Gas Heater (indirect heat)	MD-11559
T1-T3	TNK001	EU	(3) Horizontal Storage Tanks 1,000 bbl each	MD-11559
	FLA001	CE	TCI 4000 Combustion Chamber Flare	
RPV	FUG004	EU	Distance Piece Vent (a.k.a. Compressor Cylinder Rod Packing Vents) leaks	MD-11559
F-1	FUG001	EU	Fugitive Emissions	MD-11559
L-1	LUD001	EU	Truck Loading	MD-11559
P-1	PNE001	EU	Pneumatic Controllers	MD-11559
PG	FUG003	EU	Pigging Activities	MD-11559
BD	BVC001	EU	Compressor Blowdown	MD-11559
N/A	Insignificant		(16) Various size tanks with various content	N/A

[a] Engine is 4-stroke lean burn, equipped with an oxidation catalyst
[b] Engine is 4-stroke rich burn, equipped with AFRC and NSCR catalyst
[c] Flashing emissions from the tanks are controlled with a combustion chamber CU-1

Permit Condition Status

Operating Title V permit P0021927 and NSR permit P0022728 were reviewed for compliance with the permit conditions. Review of records were from the date of last inspection (July 19, 2017) to February 14, 2018. Records required to be provided to the Division in this inspection period are summarized in the applicable permit conditions below and were accepted and reviewed in IMPACT. Records required to be kept on site for a period of five (5) years were reviewed during the facility inspection. Facility representative provided a three ring binder with a copy of the records required to be kept on site.

Facility-Wide Permit Conditions

(F1) FACILITY ENGINE CONFIGURATION REQUIREMENTS
[WAQSR Ch 6, Sec 3(h)(i)(I); Ch 6, Sec 2 Permit MD-11559]

(a) The engine configuration for the facility shall be limited to no more than nine engines consisting of the following:
  (i) Six Caterpillar G3612LE compressor engines, ENG001-ENG003, ENG006, ENG010 and ENG012 (C1-C6), each equipped with an oxidation catalysts.
  (ii) Two Caterpillar G3412CLE generator engines, ENG009 and ENG011 (G3 and G4), each equipped with an oxidation catalysts.
  (iii) One Onan 7.5 JB emergency generator, ENG005 (Emerg).

(b) Once removed from the facility, an engine cannot be installed and operated in its place unless authorized by an appropriate permit modification (except as allowed for temporary engine replacement in condition F6).

(c) The permittee may expand the engine configuration beyond that described in paragraph (a) upon receipt of a construction or modification permit issued under

Chapter 6, Section 2 of WAQSR that authorizes such change. The permittee must submit an application to modify this operating permit within 12 months of commencement of operation for any engine not already included in this permit.

STATUS: No issues were noted. (a) The engine configuration for the facility is limited to nine (9) engines. (b) No engines have been removed from the facility. (c) The permittee has not expanded, no requests to modify configuration have been received.

(F2) FUGITIVE EQUIPMENT LEAK VOC EMISSIONS REQUIREMENT
[WAQSR Ch 8, Sec 6; Ch 6, Sec 2 Permit MD-11559]

The permittee shall utilize a Leak Detection and Repair (LDAR) program following the requirements of 40 CFR 60 Subpart KKK. Actual VOC emissions from fugitive equipment leaks shall be estimated as required in condition F13.

STATUS: No issues were noted. Operator utilized an LDAR program in compliance with the requirements of 40 CFR 60 Subpart KKK. Upon file review, LDAR semi-annual and annual reports were submitted in accordance with 40 CFR 60 Subpart KKK in accordance with this condition and permit conditions F13, F18, and F22 of the operating permit.

Source-Specific Permit Conditions

(F3) VISIBLE EMISSIONS
[WAQSR Ch 3, Sec 2; Ch 3 Sec 6; Ch 6, Sec 2 Permit MD-11559]

(a) The combustion chamber FLR001/FLA001 (CU-1), shall be operated and maintained to be smokeless, with no visible emissions except for periods not to exceed a total of five minutes during any two consecutive hours as determined by 40 CFR 60, Appendix A, Method 22. Visible emissions from the emergency flare, FLR002 (EF-1), shall not exceed 20 percent opacity. The combustion chamber, FLR001/FLA001 (CU-1), and the emergency flare, FLR002 (EF-1), must each be equipped and operated with an automatic ignitor or a continuous burning pilot which must be maintained in good working order.

(b) Visible emissions of any contaminant discharged into the atmosphere from any other single emission source shall not exhibit greater than 20 percent opacity except for one period or periods aggregating not more than six minutes in any one hour of not more than 40 percent opacity.

STATUS: No issues were noted. (a) Method 22 observation records indicated FLR001 combustion chamber has had no visible emissions. Method 9 observation records indicated the FLR002 process flare has had no visible emissions and did not exceed 20 percent opacity. FLR001 and FLR002 were equipped and operated with an automatic ignitor and continuous burning pilot. These were in good working order. (b) Facility records indicated no visible emissions occurred from July 20, 2017 through February 14, 2018. Visible emissions monitoring was conducted and documented in accordance with conditions, F7, F8, and F14 of the operating permit.

(F4) EMISSION LIMITS
[WAQSR Ch 3, Sec 3; Ch 6, Sec 2 Permit MD-11559]

(a) NO_X, CO, VOC and formaldehyde emissions shall not exceed the limits specified for each unit listed in Table I.

(b) Compliance with the g/hp-hr limits is considered compliance with the lb/hr and TPY limits as long as each engine is operated at or below its site-rated capacity, and does not exceed any applicable operating hour limits.

(c) Engines ENG001-ENG003, ENG006, ENG010, ENG012, ENG009 and ENG011 (C1-C6, G3 and G4) shall either reduce CO emissions by 93% or limit formaldehyde emissions to 14 ppmvd @ 15% O_2 in accordance with 40 CFR §63.6600.

(d) NO_X emissions from each heater, HET001 and HET002 (H1 and H2), shall not exceed 0.20 lb/MMBtu heat input.

(e) The distance piece vent (a.k.a compressor cylinder rod packing vents), FUG004 (RPV), VOC emission rate for each compressor engine, ENG001-ENG003, ENG006, ENG010, ENG012 (C1-C6), shall be limited to 30 standard cubic feet per hour (scfh), and to 10 scfh for the VRU compressor.

Table I: NO_X, CO, VOC and Formaldehyde Emission Limits

Source Description			NO_X			CO			VOC			Formaldehyde	
Unit ID	IMPACT ID	Model	g/hp-hr	lb/hr	TPY	g/hp-hr	lb/hr	TPY	g/hp-hr	lb/hr	TPY	lb/hr	TPY
C1-C6	ENG001, ENG002, ENG003, ENG006, ENG010, ENG012	Caterpillar G3612LE	0.7	5.7	24.8	0.25	2.0	8.9	0.5	4.0	17.7	0.65	2.83
G3, G4*	ENG009, ENG011	Caterpillar G3412CLE	1.0	1.4	0.7	0.3	0.4	0.2	0.3	0.4	0.2	0.10	0.05
CU-1	FLR001/ FLA001	Combustion Chamber		0.3	1.4		1.9	8.1		2.8	12.0		

*TPY emissions based on 1,000 hours of combined operation per year for both engines

STATUS: No issues were noted. (a) Engine testing provided to the Division indicated emissions from the engines and combustion device did not exceed the limits specified in the Table I above. (b) The engines have maintained compliance with the g/hp-hr limits. (c) Formaldehyde emissions have been limited to 14 ppmvd @ 15% O_2 in accordance with 40 CFR §63.6600. (d) NOx emissions from HET001 and HET002 did not exceed 0.20 lb/MMBtu heat input. (e) The distance piece vent, also known as the compressor cylinder rod packing vents were limited to 30 scfh. The VRU has been taken out of service.

(F5) OPERATION AND MAINTENANCE REQUIREMENTS
[WAQSR Ch 6, Sec 2 Permits MD-11559, MD-14216]

(a) The permittee shall operate and maintain engines ENG001-ENG003, ENG006, ENG010, ENG012, ENG009 and ENG011 (C1-C6, G3 and G4), air pollution control equipment, and monitoring equipment according to manufacturer's instructions at all

times, including startup, shutdown, and malfunction.

(b) The emergency generator, ENG005 (Emerg), shall be limited to 500 hours of operation per year. The permittee shall operate and maintain an hours meter on the engine to demonstrate compliance with this limit. The permittee shall operate and maintain the engine and monitoring equipment according to good air pollution control practices at all times, including startup, shutdown, and malfunction.

(c) The Caterpillar G3412CLE engines, ENG009 and ENG011 (G3 and G4), shall each be limited to 500 hours of annual operation. The permittee shall operate and maintain a non-resettable hour meter on each engine to demonstrate compliance with this limit.

(d) For each compressor engine, ENG001-ENG003, ENG006, ENG010 and ENG012 (C1-C6), if the compressor does not start under the equalizing procedures for compressors, the starter shall be replaced.

(e) Vapors from condensate flashing associated with the three 1,000 bbl horizontal condensate storage tanks, TNK001 (T1-T3), shall be controlled by the smokeless combustion chamber, FLR001/FLA001 (CU-1).

(f) The permittee shall operate and maintain the combustion chamber during all periods of active operation of the three condensate storage tanks such that the combustion chamber remains effective as a viable emissions control device.

(g) The combustion chamber, FLR001/FLA001 (CU-1), shall have ninety-eight percent (98%) destruction efficiency for the reduction of the mass content of total VOC emissions.

(h) Vapors from the condensate flash tank and stabilizer tower shall be routed to the VRU compressor. In the event the VRU compressor is unavailable or has insufficient capacity for the vapor being generated, the emergency flare, FLR002 (EF-1), shall be used to combust the vapors from the flash tank and stabilizer tower. The emergency flare shall also be used to combust the vapors from safety relief devices tied into the emergency flare header.

STATUS: No issues were noted. (a) Records indicate the air pollution control equipment and monitoring equipment were maintained according to manufacturer's instruction during startup, shutdown, and malfunction. (b) The Onan emergency generator has not been operated during this inspection period. The operator indicates they do not used the Onan. (c) ENG009 and ENG011 have a non-resettable hour meter. The hour meter indicated they ran less than 500 hours during 2017-2018. Generator operating hours reported in the Semi-Annual Monitoring and Deviation report, CRPT026775 indicated ENG009 operating hours were 3.0 and ENG011 were 7.6 during the second half of 2017. CRPT022862 indicated ENG009 operating hours were 1.9 and ENG011 were 6.1 during the first half of 2017. The engines were not in operation at the time of the inspection. (d) Documentation of compressor start-ups under equalizing procedures were provided on the facility computer. According to Enterprise records, starters have not been replaced during this inspection period. (e) Vapors from the condensate tanks were controlled by the smokeless combustion chamber (FLR001). (f) Records indicated the combustion chamber was effective as an emissions control device. (g) FLR001 was tested during this inspection period. Testing results indicated FLR001 destruction efficiency was 100%. (h) Vapors from the condensate flash tank and stabilizer tower are routed to a process flare (FLR002).

The electric driven VRU is located at the facility, however is not in use at this time. The emergency flare was reclassified as a process flare as indicated in the NSR permit P0022728, issued May 9, 2017. Permit condition 37 in P0022728 required the VRU be blinded off within ninety (90) days of permit issuance, and written notification provided within fifteen days (15) of blinding off the engine. CRPT023281, received August 28, 2017 indicated the VRU was permanently taken out of service and locked out on August 8, 2017. The final blind installation occurred on August 23, 2017.

Tested destruction efficiency on the Combustion Chamber.

F5 – COMBUSTION CHAMBER-REDUCTION OF VOC'S		
Test Date	**Source Description**	**Minimum 98% Destruction Efficiency**
6/13/2017	**FLR001**	**100%**
6/21/2016	**FLR001**	**99.9%**

(F6) ENGINE REPLACEMENT
[WAQSR Ch 6, Sec 3(h)(i)(I)]

(a) Permanent replacement of an engine must be evaluated by the Division under WAQSR Ch 6, Sec 2 prior to such replacement to determine the appropriate permitting action and evaluate the need for additional requirements resulting from the permanent replacement.

(b) Should an engine break down or require an overhaul, the permittee may bring on site and operate a temporary replacement engine until repairs are made. The temporary replacement unit shall be identical or similar to the unit replaced, with emission levels at or below those of the unit replaced. The permittee shall notify the Division in writing of such temporary replacement within five working days and include the following:

(i) The startup date of the temporary replacement unit; and

(ii) A statement regarding the applicability of any New Source Performance Standards (NSPS) in 40 CFR 60; any National Emission Standards for Hazardous Air Pollutants (NESHAPs) in 40 CFR 63; and Compliance Assurance Monitoring (CAM) in WAQSR Ch 7, Sec 3 for the temporary replacement unit.

STATUS: No issues were noted. (a) No permanent replacement of an engine occurred during this inspection period. (b) No temporary replacement engines were brought in during this inspection period.

Testing and Monitoring Requirements

(F7) EMISSIONS TESTING
[W.S. 35-11-110; WAQSR Ch 6 Sec 2 Permits MD-11559, MD-14216]

(a) The Division reserves the right to require additional testing as provided under condition G1 of this permit. The Division shall specify the necessary test method(s) and procedure(s) prior to the test, which may include the following test methods found at 40 CFR 60, Appendix A:

(i) For visible emissions from the emergency flare and the combustion chamber, Method 22.

(ii) For visible emissions from other sources, Method 9.

(iii) For NO_X, CO, and VOC emissions from any engine subject to the requirements of 40 CFR 60 Subpart JJJJ, follow the requirements of §60.4244.

(iv) For formaldehyde emissions and CO emission reduction from engines ENG001-ENG003, ENG006, ENG010, ENG012, ENG009 and ENG011 (C1-C6, G3 and G4), follow the requirements of §63.6615.

(v) For NO_X emissions from other sources, Methods 1-4 and 7 or 7E.

(vi) For CO emissions from other sources, Methods 1-4 and 10.

(vii) For VOC emissions from the distance piece vents, the procedure attached as Appendix A of this permit.

(viii) For VOC emissions from other sources, Methods 1-4 and 25A.

(ix) For alternative test methods, or methods used for other pollutants, the approval of the Administrator must be obtained prior to using the test method to measure emissions.

(b) Unless otherwise specified, testing shall be conducted in accordance with WAQSR Ch 5, Sec 2(h).

STATUS: No issues were noted. (a) The Division has not required additional testing as provided under condition G1 of this permit. Emission testing included the test methods listed in this condition. Annual performance tests were in accordance with EPA reference methods and Wyoming's Portable Analyzer Protocol. (b) Testing was conducted in accordance with WAQSR Ch 5, Sec 2 (h) and the above required testing methods.

(F8) VISIBLE EMISSIONS MONITORING
[WAQSR Ch 6, Sec 3(h)(i)(C)(I)]

(a) Periodic monitoring for visible emissions from the emergency generator, ENG005 (Emerg), shall consist of monitoring the type of fuel used to ensure that propane or natural gas are the only fuel sources for the unit.

(b) Periodic monitoring for visible emissions from the units referenced in condition F4 of this permit shall consist of monitoring the type of fuel used to ensure that natural gas is the sole fuel source for these units.

(c) The permittee shall monitor and note the date, time and duration of any event when the combustion chamber, FLR001/FLA001 (CU-1), exhibits visible emissions for more than five minutes.

STATUS: No issues were noted. (a) Method 9 for visible emissions from ENG005 were conducted periodically and only when the engine was started. ENG005 emergency generator is documented as using natural gas for its fuel source. (b) Records of Method 22 for visible emissions monitoring of the process flare and combustion chamber were provided and indicate visible emissions monitoring was conducted monthly from 2017 through 2018. (c) No visible emissions from the combustion chamber were recorded during this inspection period.

(F9) EMISSIONS TESTING AND MONITORING
[WAQSR Ch 6, Sec 3(h)(i)(C)(I); Ch 6, Sec 2 Permit MD-14216]

(a) The permittee shall conduct emissions testing for each engine as described below to assess compliance with the emission limits specified in conditions F4(a) and (c) of this permit.

(i) For each compressor engine, ENG001-ENG003, ENG006, ENG010 and ENG012 (C1-C6):
(A) Periodic testing for NO_X, CO, and VOC emissions shall be conducted annually, within 12 months after completion of the last periodic test. Testing for NO_X, CO, and VOC shall be conducted concurrently.
(B) For engines subject to 40 CFR 60 Subpart JJJJ, testing shall follow 40 CFR 60 Subpart JJJJ §60.4244.
(C) For engines not subject to 40 CFR 60 Subpart JJJJ, testing shall be conducted in accordance with the EPA Reference Methods specified in condition F7 or the State of Wyoming's Portable Analyzer Protocol.

(ii) For each generator engine, ENG009 and ENG011 (G3 and G4):
(A) Periodic testing for NO_X, CO, and VOC shall be conducted once every three calendar years, within 3 years after completion of the last periodic test. Testing for NO_X, CO, and VOC shall be conducted concurrently.
(B) For engines subject to 40 CFR 60 Subpart JJJJ, testing shall follow 40 CFR 60 Subpart JJJJ §60.4244.
(C) For engines not subject to 40 CFR 60 Subpart JJJJ, testing shall be conducted in accordance with the EPA Reference Methods specified in condition F7, or the State of Wyoming's Portable Analyzer Protocol.

(iii) For each engine, ENG001-ENG003, ENG006, ENG010, ENG012, ENG009 and ENG011 (C1-C6, G3 and G4), periodic testing for formaldehyde shall be conducted concurrently with the NO_X, CO, and VOC testing required in paragraphs (i) and (ii) of this sub condition and in accordance with 40 CFR

§63.6615. Results of the formaldehyde tests shall be reported in terms of ppmvd at 15% O_2 and lb/hr. Emissions in terms of lb/hr shall be calculated using the methodology in Sections 10.1.1.1 and 10.1.1.2 of the State of Wyoming's Portable Analyzer Protocol.

(iv) If any testing/monitoring required in this requirement shows operation outside the emission limits specified in conditions F4(a) or (c), the permittee shall:

(A) Notify the Division within 24-hours of completion of the test, and
(B) Repair and retest/monitor the affected engine to demonstrate the engine has been returned to operation within the limits in conditions F4(a) or (c), by no later than seven calendar days after completion of the testing/monitoring event that showed operation outside of emission limits.
(C) Compliance with this condition regarding repair and retesting/monitoring shall not be deemed to limit the authority of the Division to cite the owner or operator for an exceedance of the emission limits for any testing which shows noncompliance.

(v) Use of a portable emissions analyzer shall follow the State of Wyoming Portable Analyzer Monitoring Protocol, which can be downloaded at http://deq.wyoming.gov/aqd/title-v-operating-permit-program/ or is available from the Division upon request.

(b) The permittee shall measure NO_X, CO, and VOC emissions from the combustion chamber, FLR001/FLA001 (CU-1), at least once every calendar year to assess compliance with the emission limits in condition F4(a) and the destruction efficiency requirement in condition F5(g). Periodic tests are required within 12 months after completion of the last periodic test.

(i) NO_X and CO emissions testing shall consist of three 1-hour tests following the EPA Reference Methods specified in condition F7 or other Division approved Methods.

(ii) VOC emissions testing shall consist of three 1-hour simultaneous tests at the inlet and outlet of the combustion chamber following the EPA Reference Methods specified in condition F7. During VOC emissions testing, the permittee shall also measure and evaluate the CAM indicators as specified in condition F12.

(c) The distance piece vent (a.k.a compressor cylinder rod packing vents), FUG003 (RPV), VOC emission rates for each compressor shall be determined every calendar quarter to verify compliance with the limits in condition F4 (e).

(i) Testing to determine the total vent flow rate shall follow the procedure attached as Appendix A.

(ii) The total vent flow rate shall be multiplied by the total VOC content of the gas (volume %), as determined by the most recent gas analysis (which shall be

determined at least annually). The resulting VOC emission rate, in standard cubic feet per hour, shall be compared to the limits in condition F4 (e).

(iii) Revision to this procedure must first be authorized by a WAQSR Ch 6, Sec 2 permitting action and then a Ch 6 Sec 3 operating permit amendment issued prior to implementing action.

(d) The permittee shall notify the Division prior to testing as specified in condition F19 and report the test results in accordance with condition F20.

STATUS: No issues were noted. (a) Each compressor engine (ENG001-ENG003, ENG006, ENG010 and ENG012) 3668 hp Caterpillar G3512LE engines were tested every 12 months. The engines tested within the permitted limits. ENG009 and ENG011, 637 hp Caterpillar G3412CLE generator engines have been tested every three years with previous testing completed in 2016, and were within the permitted limits. The next required test for ENG009 and ENG010 will occur in 2019. Formaldehyde was conducted concurrently with NOx, CO, and VOC testing. (b) FLR001 combustion chamber testing was provided once every calendar year. (c) VOC emission rates for the distance piece vent on each compressor was determined every calendar quarter and provided in a semiannual report. The most recent Semi-annual Monitoring and Deviation report, CRPT026775 indicated VOC emission rates from the distance piece vents on the compressors were below 30 SCFH, in compliance with condition F4 during the second half of 2017. (d) Notifications have occurred within 15 days, in accordance with permit condition F19. Test result reports and reporting have been provided within the timelines defined in permit condition F20.

(F10) OPERATION MONITORING
[WAQSR Ch 6, Sec 3(h)(i)(C)(I); Ch 6, Sec 2 Permit MD-11559]

(a) The permittee shall continuously monitor for the presence of a pilot flame on the emergency flare, FLR002 (EF-1), using a thermocouple and continuous recording device or any other equivalent device to detect the presence of a flame.

(b) The permittee shall monitor use of the emergency generator, ENG005 (Emerg), and the two generator engines, ENG009 and ENG011 (G3 and G4), for comparison with the operating hours limits in conditions F5 (b) and (c) of this permit.

STATUS: No issues were noted. (a) The thermocouple and continuous recording device for FLR002 was observed on the process flare and was monitored in the facility control room. (b) Generator operating hours reported in the Semi-Annual Monitoring and Deviation reports, CRPT026775 indicated ENG009 operating hours were 3.0 and ENG011 were 7.6 during the second half of 2017. CRPT022862 indicated ENG009 operating hours were 1.9 and ENG011 were 6.1 during the first half of 2017, in compliance with the operating hour limits in permit condition F5.

(F11) ENGINE CATALYST MONITORING AND MAINTENANCE
[WAQSR Ch 6, Sec 2 Permit MD-11559]

The permittee shall follow the monitoring and maintenance requirements as follows for the engines equipped with oxidation catalyst ENG001-ENG003, ENG006, ENG010, ENG012, ENG009 and ENG011 (C1-C6, G3 and G4):

(a) Operate and maintain a thermocouple to measure the temperature at the inlet of the catalyst. The inlet temperature shall be monitored and recorded at least monthly. If the temperature is outside the range of 450°F to 1350°F, corrective action shall be taken.

(b) Operate and maintain a device to measure the pressure drop across the catalyst. The pressure drop across the catalyst shall be monitored and recorded at least monthly. If the pressure changes by more than two inches of water, at plus or minus ten percent of 100 percent load, from the reference pressure drop as determined below, corrective action shall be taken.

(i) Reference pressure drop for each engine shall be established during the initial performance test.

(ii) When a catalyst is replaced, the reference pressure drop shall be re-established for that engine during the subsequent periodic test required by condition F9 (a).

(c) Compliance with 40 CFR 63 Subpart ZZZZ §63.6605 and §63.6640 may be used in lieu of the monitoring and maintenance requirements in conditions F11 (a) and (b).

STATUS: No issues were noted. (a) Each affected RICE is equipped with a Continuous Parameter Monitoring System (CPMS) consisting of temperature sensor upstream of the catalyst bed linked to an electronic data recording system. Inlet temperature is recorded in 15-minute intervals and reduced to rolling 4-hour averages in accordance with Subpart ZZZZ. (b) Records indicate inlet catalytic temperatures, pressure drop across the catalyst were monitored and recorded in accordance with this condition. (c) CRPT026404 semiannual report received January 22, 2018 and CRPT022924 semiannual report received July 31, 2017, indicated differential pressures across each catalyst to gather monthly readings were monitored. Compliance with 40 CFR 63 Subpart ZZZZ was used for monitoring and maintenance requirements in this permit condition.

(F12) COMPLIANCE ASSURANCE MONITORING (CAM)
[WAQSR Ch 7, Sec 3(c)(ii); Ch 6, Sec 3(h)(i)(C)(I); Ch 6, Sec 2 Permit MD-11559]

For VOC emissions from the combustion chamber, FLR001/FLA001(CU-1), the permittee shall adhere to the compliance assurance monitoring (CAM) plan, attached as Appendix C of this permit, and shall conduct monitoring during active operation of any storage tank, TNK001 (T1-T3), as follows:

(a) Using a thermocouple and continuous recording device or any other equivalent device to detect the presence of a pilot flame in the combustion chamber, the

permittee shall monitor for times of active operations of any storage tank during which the combustion chamber is inoperable.

(i) The permittee shall monitor the temperature of the combustor pilot at least once a day by way of the panel indicator.

(ii) An excursion, which is considered operation below the minimum temperature established in the approved CAM plan, shall trigger immediate inspection and, if appropriate, corrective action.

(b) The permittee shall maintain and operate a pressure gauge, located at the inlet of the waste gas flow to the combustion chamber.

(i) The permittee shall monitor the inlet waste gas pressure, at least once daily.

(ii) An excursion, which is considered operation outside the pressure range established in the approved CAM plan, shall trigger immediate inspection and, if appropriate, corrective action.

(c) The permittee shall perform annual VOC emissions testing for the combustion chamber as specified in condition F9 (b). During each test, the permittee shall also measure the CAM indicators. Following each test, the permittee shall evaluate the data from the test, together with data from previous testing, to determine if the indicator ranges in the CAM plan should be revised.

(d) The permittee shall follow all other applicable requirements under conditions CAM-1 through CAM-4 of this permit.

STATUS: No issues were noted. (a) Facility electronic records indicated the Combustion Chamber, FLR001 is continuously monitored for temperature of the pilot and inlet gas waste pressure. (b) A pressure gauge located at the inlet of the waste gas flow is maintained and operated. (c) VOC emission testing has been conducted in accordance with permit condition F9. VOC testing records indicated average emission rate was zero. Records indicate inlet waste gas pressure has not operated outside the pressure range during this inspection period. No excursions have been activated.

(F13) FUGITIVE EQUIPMENT LEAK VOC EMISSIONS MONITORING
[WAQSR Ch 8, Sec 6; Ch 6, Sec 3(h)(i)(C)(I); Ch 6, Sec 2 Permits MD-11559, MD-14216]

The permittee shall follow the requirements of 40 CFR 60 Subpart KKK for the LDAR program required by condition F2. Fugitive VOC emissions shall be calculated annually in accordance with the methodology described in Appendix B of this permit. Revisions to the methodology must first be approved by the Division and a WAQSR Ch 6, Sec 3 operating permit amendment or modification issued prior to implementation.

STATUS: No issues were noted. Fugitive emissions have been calculated in accordance with the approved methodology. Submittal of semiannual KKK monitoring reports, annual equipment leaks reports have been provided and are listed under condition F22. Enterprise has implemented an LDAR program in

accordance with conditions F2, F13, F18, F22, and 40 CFR 60 Subpart KKK. Annual leaks/VOC monitoring reports are provided in the table under permit condition F22 and have been accepted into IMPACT.

Recordkeeping Requirements

(F14) EMISSIONS TESTING AND MONITORING RECORDS
[WAQSR Ch 6, Sec 3(h)(i)(C)(II); Ch 6, Sec 2 Permits MD-11559, MD-14216; Waiver wv-13694]

(a) For any testing or monitoring performed under conditions F7 and F9, other than Method 9 or Method 22 observations, the permittee shall record, as applicable, the following:

(i) The date, place, and time of sampling, measurements, or observations;

(ii) The company or entity that performed the analyses or observations;

(iii) The analytical techniques or methods used;

(iv) The results of such analyses or observations; and

(v) The operating conditions as they existed at the time of the testing, monitoring, or observation including, for engines, the horsepower, inlet temperature to the catalyst, and pressure drop across the catalyst.

(b) For any Method 9 observations required by the Division under condition F7, the permittee shall keep field records in accordance with Section 2.2 of Method 9.

(c) For any Method 22 observations required by the Division under condition F7, the permittee shall keep field records in accordance with Sections 11.2 and 11.5 of Method 22, and record the operating conditions of the observed unit as they existed at the time of observation.

(d) For visible emissions monitoring under condition F8(c), the permittee shall record the date, time and duration when the combustion chamber, FLR001/FLA001 (CU-1), exhibits visible emissions for more than five minutes, as well as any corrective actions taken.

(e) For the engine catalyst monitoring and maintenance required under condition F11, the permittee shall record the catalyst inlet temperature, pressure drop, any maintenance and/or corrective action triggered, and the reference pressure drop for each engine at the time of the monitoring. The permittee shall also record the dates of catalyst replacement for each engine.

(f) For the distance piece vent monitoring required under condition F9(c), the permittee shall keep records of monitoring results, packing replacements, and any deviations from condition F9(c) and the Distance Piece Vent Testing Procedure attached as Appendix A of this permit. Records shall include all test documentation, gas

analysis, and calculations used to show compliance with the limits in condition F4 (e).

(g) The permittee shall retain records required in conditions (a)-(f) on-site at the facility, for a period of at least five years from the date the records are generated.

(h) The permittee shall retain records for hours of operation for the Volvo TAD520GE diesel generator engine authorized by temporary waiver wv-13694, for a period of at least five years from the date the records were generated.

STATUS: No issues were noted. (a) Testing and monitoring operating conditions were recorded and observed in the reports and at the facility for review. (b) No visible emissions were observed from the sources. As a result, Method 9 monitoring of visible emissions from other sources was not required. (c) Method 22 observations for visible emissions from the process flare and combustion chamber were conducted monthly from 2017 through 2018. (d) No visible emissions were reported during the inspection period. (e) Emission tests were conducted in accordance to the required testing methods. Engine catalyst monitoring and maintenance included catalyst inlet temperature, pressure drop, and maintenance. (f) Distance piece vent records of monitoring results, packing replacements, and any additional information was provided in the reports. (g) These records are maintained at the facility for a period of at least five years from the date the records were generated. (h) According to COR043237 dated August 6, 2012, a temporary operation waiver (wv-13694) for the Volvo TAD520GE diesel generator engine was authorized for 24 hours for a shutdown. The Volvo TAD520GE diesel generator was not at the facility at the time of this inspection.

(F15) OPERATION MONITORING RECORDS
[WAQSR Ch 6, Sec 3(h)(i)(C)(II); Ch 6, Sec 2 Permits MD-11559, MD-14216; Waiver wv-13656]

(a) For the operating hours monitoring required by condition F10(b), the permittee shall record the operating hours of the emergency generator, ENG005 (Emerg), and the two generator engines, ENG009 and ENG011 (G3 and G4), on at least a monthly basis. This shall include records required by temporary waiver wv-13656 for the Caterpillar G3412CLE generator engines ENG009 and ENG011 (G3 and G4).

(b) The permittee shall maintain records of all compressor start up events (starter gas); document whether or not the equalizing procedures were followed and, if necessary, document any starter replacements required by condition F5 (d).

(c) The permittee shall maintain records noting the date and duration of time when the VRU compressor is unavailable or has insufficient capacity for the vapors from the condensate flash tank and stabilizer tower, and whether they were routed to the emergency flare, FLR002 (EF-1).

(d) For the emergency flare FLR002 (EF-1) monitoring required under condition F10 (a), the permittee shall maintain records indicating the presence of a pilot flame, including the date and duration of events when the pilot flame is not present. The records shall contain a description of the reason(s) for absence of the pilot flame and steps taken to return the pilot flame to proper operation.

(e) The permittee shall retain these records on-site at the facility, for a period of at least five years from the date the records are generated.

STATUS: No issues were noted. (a) Operating hours of the emergency generator, ENG005 (Emerg), and the two generator engines, ENG009 and ENG011, are recorded on a monthly basis. (b) No starter replacements occurred since the last inspection date. (c) The VRU compressor is not in operation at this time. Vapors from condensate flash tank and stabilizer tower are routed to the process flare, FLR002. (d) FLR002 continuous recording device records detected the presence of a flame including date and duration of events when the pilot flame was not present. (e) These records are maintained at the facility for a period of at least five years from the date the records were generated.

(F16) MAINTENANCE RECORDS
[WAQSR Ch 6, Sec 3(h)(i)(C)(II); Ch 6, Sec 2 Permit MD-11559]

(a) The permittee shall maintain records of maintenance activities for engines, required by condition F5 (a) and (b), which shall include:
  (i) The maintenance activity performed;
  (ii) The date and place the activity was performed;
  (iii) The company and individual(s) that performed the activity;
  (iv) The purpose of the activity;
  (v) An explanation for any deviation from the manufacturer's recommendations or good air pollution control practices; and
  (vi) Any corrective actions taken.

(b) The permittee shall retain these records on-site at the facility, for a period of at least five years from the date the records are generated.

STATUS: No issues were noted. (a) Maintenance activity records were provided in a three ring binder during the permit review and observed at the facility. These records included the required documentation. Maintenance records and scheduling of maintenance appeared to be in accordance with manufacturer's recommendations. (b) These records are maintained at the facility for a period of at least five years from the date the records were generated.

(F17) CAM RECORDS
[WAQSR Ch 7, Sec 3(i)(ii); Ch 6, Sec 3(h)(i)(C)(II); Ch 6, Sec 2 Permit MD-11559]

For the CAM monitoring required under condition F12 the permittee shall maintain records as described in the CAM Plan attached as Appendix C, as well as the following:

(a) Maintain records noting the date and duration of time during active operation of any storage tank, TNK001 (T1-T3), when the pilot flame is not present and/or the combustion chamber is inoperable. The records shall contain a description of the reason(s) for absence of the pilot flame or otherwise inoperable condition and steps taken to return the combustion chamber to proper operation.

(b) Record the pilot temperature and inlet pressure as measured during sampling required by condition F9 (b) and the evaluation of the indicator ranges.

(c) Record the date, time, and duration of any excursions as well as the CAM indicator value(s) during each excursion.

(d) Maintain records of monitor performance data, corrective actions taken, and any written quality improvement plan required pursuant to WAQSR Ch 7, Sec 3(h), any activities undertaken to implement a Quality Improvement Plan (QIP), and other supporting information required to be maintained under WAQSR Ch 7, Sec 3.

(e) The permittee shall retain these records on-site at the facility for a period of at least five years from the date the records are generated.

STATUS: No issues were noted. (a) Compliance Assurance Monitoring (CAM) requirements have been implemented. Facility electronic records indicated FLR001 was continuously monitored for presence of a pilot flame. (b) Pilot temperature and inlet pressure was monitored and did not trigger an excursion. (c) Monitoring required under condition F12 indicates no excursion or downtime incidents occurred during the reporting period. (d) Additional requirements specified under conditions of CAM-2 through CAM-4 were also met and in accordance with Enterprise Operating Plan and VOC CAM Plan. (e) These records are maintained at the facility for a period of at least five years from the date the records were generated.

(F18) FUGITIVE EQUIPMENT LEAK VOC EMISSIONS RECORDS
[WAQSR Ch 8, Sec 6; Ch 6, Sec 3(h)(i)(C)(II); Ch 6, Sec 2 Permit MD-14216]

(a) The permittee shall keep records of the LDAR program required by condition F2 which shall include:
  (i) The dates and results of all LDAR inspections performed pursuant to the LDAR protocol;
  (ii) The date(s) and type of any corrective actions taken, if appropriate, as a result of the required inspections; and
  (iii) All other records in accordance with 40 CFR 60 Subpart KKK.

(b) The permittee shall keep records of the monitoring and calculations required by condition F13. The records shall include the following:

(i) The actual VOC emissions from equipment fugitive leaks for the facility in tons per year;

(ii) A comparison of the calculated actual fugitive VOC emissions to the VOC emissions represented in the WAQSR Chapter 6, Section 2 Permit MD-14216 application;

(iii) Documentation of the actual fugitive VOC emission calculations for the facility, including the representative gas analysis used, weight percent TOC and VOC concentrations, and component type, service, and counts;

(iv) The emission factors and EPA protocol approach (es) that were used; and

(v) The adjustments for VOC content and LDAR control effectiveness.

(c) The permittee shall retain these records on-site at the facility, for a period of at least five years from the date the records are generated.

STATUS: No issues were noted. (a) Fugitive equipment leak VOC emissions monitoring reports were provided. LDAR was performed and results were submitted in accordance with 40 CFR 60 Subpart KKK, permit conditions F2, F13, F18, and F22. (b) Records of the monitoring and calculations required by permit condition F13 were included in the reports. (c) These records are maintained at the facility for a period of at least five years from the date the records were generated.

Reporting Requirements

(F19) NOTIFICATION REQUIREMENTS
[WAQSR Ch 6, Sec 3(h)(i)(C)(III); Ch 6, Sec 2 Permits MD-11559, MD-14216]

(a) Upon shutdown and removal of an engine from the facility, written notification is required within 15 days of removal. Such notification shall be submitted on a complete Engine Installation/Removal form. The form can be downloaded from the Air Quality website http://deq.wyoming.gov/aqd/new-source-review/ or obtained from the Air Quality Division.

(b) Notification of the test date for the monitoring required by condition F9 (a) and (b) shall be provided to the Division at least 15 days prior to testing. For engines subject to the requirements of 40 CFR 60 Subpart JJJJ, the permittee shall provide test notification as specified in §60.8 of 40 CFR 60.

STATUS: No issues were noted. (a) Written notification of the VRU shutdown was submitted on a complete Engine Installation/Removal form. The electric driven VRU located at the facility, is not in use at this time. The emergency flare was reclassified as a process flare as indicated in the NSR permit P0022728, issued May 9, 2017. Permit condition 37 in P0022728 required the VRU be blinded off within ninety (90) days of permit issuance. The VRU was not blinded off within ninety (90) days of permit issuance. However, CRPT023281 received August 28, 2017 indicated the VRU was permanently taken out of service and locked out on August 8, 2017. The report

indicated the final blind installation occurred on August 23, 2017. (b) No testing is required for the shutdown of the VRU.

(F20) TEST REPORTS
[WAQSR Ch 6, Sec 3(h)(i)(C)(III); Ch 6, Sec 2 Permit MD-14216]

(a) The permittee shall report the results of any emissions tests performed under conditions F9 (a) and (b), and any additional testing required by the Division under condition F7, within 45 days of completing the tests.

(i) However, if testing for any engine shows operation out of compliance, the Division must be notified within 24 hours as indicated under condition F9(a).

(ii) The reports shall also include the evaluation of CAM indicator ranges as required by condition F9 (b). If the evaluation indicates the CAM range(s) need(s) to be revised, the permittee shall submit a revised CAM plan to the Division, along with a request to administratively amend this permit, within 60 days of completing the test.

(b) The reports shall include the information specified under condition F14 (a), reference this permit condition (F20), and be submitted to the Division in accordance with condition G4.

STATUS: No issues were noted. (a) Emissions testing for each engine and FLR001 were conducted as described in permit condition F9. FLR001 was last tested June 13, 2017. Emission testing result reports were not provided within 45 days of the emission tests. Emission tests results were reported within 51 and 52 days, date received was March 29, 2018. CAM reports indicated no revisions are required. (b) The reports included monitoring information as specified under permit condition F14; however do not reference permit condition F20. These reports were submitted to the Division in accordance with permit condition G4.

The following tested emission reports have been accepted into IMPACT.

F20 – TESTED NOx, CO, VOC, and FORMALDEHYDE EMISSIONS									
Source Description			NOx		CO		VOC		HCOH
Stack Test ID	IMPACT ID	Stack Test Date	g/hp-hr	lb/hr	g/hp-hr	lb/hr	g/hp-hr	lb/hr	lb/hr
STCK029642	ENG012	2/6/2018	0.5	3.3	0.02	0.2	0.2	1.3	0.12
STCK029641	ENG010	2/6/2018	0.4	2.9	0.03	0.2	0.2	1.5	0.17
STCK029640	ENG006	2/5/2018	0.4	2.8	0.07	0.6	0.2	1.8	0.39
STCK029639	ENG003	2/5/2018	0.4	2.9	0.06	0.4	0.2	1.8	0.43
STCK029638	ENG002	2/5/2018	0.4	3.1	0.05	0.4	0.2	1.1	0.65
STCK029637	ENG001	2/5/2018	0.4	3.3	0.05	0.4	0.2	1.3	0.65
STCK028443	FLR001	6/13/2017	--	0.0	--	0.0	--	0.0	--

(F21) MONITORING REPORTS
[WAQSR Ch 6, Sec 3(h)(i)(C)(III); Ch 6, Sec 2 Permits MD-11559, MD-14216]

(a) The following shall be reported to the Division for each semiannual reporting period from January 1 through June 30, and from July 1 through December 31, within 31 days of the end of each period (by July 31 and January 31, respectively, each year):

(i) Documentation that the emergency generator, ENG005 (Emerg), is firing natural gas or propane as specified in condition F8 (a).

(ii) Documentation that the Caterpillar engines, ENG001-ENG003, ENG006, ENG010, ENG012, ENG009 and ENG011 (C1-C6, G3 and G4), and the heaters, HET001 and HET002 (H1 and H2), are firing natural gas as specified in condition F8 (b).

(iii) Summary results of the combustion chamber, FLR001/FLA001 (CU1), visible emissions monitoring required under condition F8(c). Only monitoring during which excess visible emissions are observed from the combustion chamber, and any corrective actions taken, shall be included in the report. If no visible emissions are observed during the reporting period, this shall be stated in the report.

(iv) Summary results of the emergency flare monitoring required under condition F10 (a). If there were outages of the pilot flame during operations of the condensate flash tank and stabilizer tower, and safety relief devices tied into the emergency flare, the permittee shall report the date(s) and duration of time during active operation when the pilot flame was not present, description of the reason(s) for absence of the pilot flame and steps taken to return the pilot flame to proper operation. If no pilot flame outages occurred during the reporting period, this shall be stated in the report.

(v) Summary of dates and duration of times when the VRU compressor was unavailable or had insufficient capacity for the vapors being generated from the condensate flash tank and stabilizer tower and those vapors were routed to the emergency flare, FLR002 (EF-1). If the VRU compressor was available and had sufficient capacity for the vapor being generated at all times during the reporting period, this shall be stated in the report.

(vi) The calendar year to date operating hours of the emergency generator, ENG005 (Emerg), and two generator engines, ENG009 and ENG011 (G3 and G4).

(vii) Summary results of the quarterly monitoring required by condition F9(c) for the distance piece vent VOC emission rate and packing replacements for each compressor engine, including for the most recent two quarters the total flow rate in scfh, the volumetric % VOC content, and the VOC emission rate in scfh.

(viii) The number, duration, and cause of the excursions from the temperature and pressure drop ranges specified in condition F11 for each of the catalytically

controlled engines. The report shall include a summary of any maintenance and/or corrective actions taken; if no excursions occurred during the reporting period, this shall be stated in the report. If an engine did not operate for the entire month, this shall be stated in the report.

(ix) Results of the CAM monitoring required under condition F12. The results shall include the following, as applicable:

(A) Information on the number, duration, and cause of excursions, as applicable, and the corrective actions taken.

(B) Summary information on the number, duration, and cause for monitor downtime incidents.

(C) A description of the action taken to implement a QIP (if required) during the reporting period as specified in Chapter 7, Section 3 (h). Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has reduced the likelihood of similar excursions.

(D) If no excursions or downtime incidents occurred during the reporting period, this shall be stated in the report.

(b) All instances of deviations from the conditions of this permit must be clearly identified in each report.

(c) The reports shall reference this permit condition (F21), and be submitted to the Division in accordance with condition G4.

STATUS: No issues were noted. (a) Semiannual monitoring reports were submitted within 31 days of the end of each reporting period as shown in the table below. Enterprise has provided complete and timely reports in accordance with this condition. (b) Instances of deviations are provided and summarized in condition F9, F10, and 40 CFR 63 Subpart ZZZZ of this report and in the semiannual monitoring reports below. (c) CRPT026775 referenced permit condition F21. Previous report CRPT022862 reference F19 of the expired Title V permit. The following reports have been accepted into IMPACT.

F21 – SEMIANNUAL MONITORING			
Report ID	**Received Date**	**Reporting Period**	**Report Title**
CRPT026775	**1/29/2018**	**7/1 – 12/31/2017**	**Semi-Annual Monitoring and Deviation Report**
CRPT022862	**7/31/2017**	**1/1 – 6/30/2017**	**Semi-Annual Monitoring and Deviation Report**

(F22) FUGITIVE EQUIPMENT LEAK VOC EMISSIONS REPORTS
[WAQSR Ch 6, Sec 3(h)(i)(C)(II); Ch 6, Sec 2 Permit MD-14216]

(a) By March 1 of each calendar year, the permittee shall submit a report on the facility's actual VOC emissions from fugitive equipment leaks for the previous calendar year. The report shall include the following:

(i) Total actual fugitive VOC emissions in TPY;

(ii) A summary of the comparison of the calculated actual fugitive VOC emissions to the VOC emissions represented in the WAQSR Chapter 6, Section 2 Permit MD-14216 application;

(iii) Documentation of the actual fugitive VOC emission calculations for the facility, including the component type, service, and counts;

(iv) The emission factors and EPA protocol approach (es) that were used; and

(v) The adjustments for VOC content and LDAR control effectiveness.

(b) The permittee shall comply with the reporting requirements in 40 CFR 60 Subpart KKK for the LDAR program required by condition F2.

(c) All instances of deviations from the conditions of this permit must be clearly identified in each report.

(d) The reports shall reference this permit condition (F22), and be submitted to the Division in accordance with condition G4.

STATUS: No issues were noted. (a) Report on the facilities actual VOC emissions from fugitive equipment leaks were provided for the previous calendar year and included the required information. (b) Reporting was in accordance with 40 CFR 60, Subpart KKK, F2, F13, and F18. (d) CRPT026784 referenced F22 and was submitted to the Division in accordance with condition G4.

The annual report below was provide in compliance with this condition and was placed into IMPACT.

F22 – ANNUAL FUGITIVE EQUIPMENT LEAK VOC EMISSIONS			
Report ID	**Received Date**	**Reporting Period**	**Report Title**
CRPT027063	**2/5/2018**	**2017**	**Annual Equipment Leaks Report**

(F23) GREENHOUSE GAS REPORTS
[W.S. 35-11-110]

The permittee shall submit to the Division a summary of any report(s) required to be submitted to the EPA under 40 CFR 98.

(a) The reports shall be submitted to the Division within 60 days of submission to EPA, in a format as specified by the Division.

(b) The reports shall be submitted in accordance with condition G4 (a)(i) of this permit, to the attention of the Division's Emission Inventory Program.

STATUS: No issues were noted. (a) CRPT023288 Greenhouse Gas report was received August 28, 2017 for the years 2016, 2015 and 2014. The reporting period is from January 1 through to December 12, 2016, 2015, and 2014. The reporting date appears to be March 29, 2017. (b) The report was submitted to the Division in accordance with G4 of this permit.

F23 – ANNUAL GREENHOUSE GAS			
Report ID	**Received Date**	**Reporting Period**	**Report Title**
CRPT023288	**8/28/2017**	**1/1/2014–12/31/2016**	**Greenhouse Gas Report**

(F24) REPORTING EXCESS EMISSIONS & DEVIATIONS FROM PERMIT REQUIREMENTS
[WAQSR Ch 6, Sec 3(h)(i)(C)(III)]

(a) General reporting requirements are described under the General Conditions of this permit. The Division reserves the right to require reports as provided under condition G1 of this permit.

(b) Emissions which exceed the limits specified in this permit and which are not reported under a different condition of this permit shall be reported annually with the emission inventory unless specifically superseded by condition G17, condition G19, or other condition(s) of this permit. The probable cause of such exceedance, the duration of the exceedance, the magnitude of the exceedance, and any corrective actions or preventative measures taken shall be included in this annual report. For sources and pollutants which are not continuously monitored, if at any time emissions exceed the limits specified in this permit by 100 percent, or if a single episode of emission limit exceedance spans a period of 24 hours or more, such exceedance shall be reported to the Division within one working day of the exceedance. (Excess emissions due to an emergency shall be reported as specified in condition G17. Excess emissions due to unavoidable equipment malfunction shall be reported as specified in condition G19.)

(c) Any other deviation from the conditions of this permit shall be reported to the Division in writing or electronically through the Division's IMPACT system (https://airimpact.wyo.gov), within 30 days of the deviation or discovery of the deviation.

STATUS: No issues were noted. (a) No additional reports have been requested. (b) Excess emissions due to unavoidable equipment malfunctions were reported as specified in condition G19. No deviations from the conditions of this permit were reported to the Division.

F24 (G19) – UNAVOIDABLE EQUIPMENT MALFUNCTION					
Report ID	**Received Date**	**Malfunction Date**	**Description**	**VOC (tons/event)**	**Emissions (Mscf)**
COR063587	**11/10/2017**	**11/10/2017**	**ESD, Compressor Shutdown – 24 hr notice**	**--**	**--**
CRPT025181	**11/20/2017**	**11/10/2017**	**ENG001, PSV Release**	**0.0125**	**0.475**

VRU compressor operation permitting

(F25) VRU COMPRESSOR AND EMERGENCY FLARE
[WAQSR Ch 6, Sec 3(h)(i)(C)(I)]

By January 26, 2017, permittee shall install and operate the VRU compressor, as specified in condition F5(h) of this permit, or apply to the WAQSR Ch 6, Sec 2 New Source Review Permit Program to reflect actual operation of the emergency flare, FLR002 (EF-1).

STATUS: No issues were noted. Enterprise applied to WAQSR New Source Review Permit Program to reflect actual operation of the emergency flare, FLR002. An updated NSR permit, P0022728 was issued May 9, 2017 to designate the emergency flare into a process flare and route vapors from the condensate flash tank and stabilizer tower to the process flare. The VRU (ENG008) was blinded off and a written notice was provided in accordance with P0022728.

WAQSR CHAPTER 5, SECTION 2 NEW SOURCE PERFORMANCE STANDARDS (NSPS) AND 40 CFR 60 SUBPART Kb REQUIREMENTS FOR VOLATILE ORGANIC LIQUID STORAGE VESSELS (INCLUDING PETROLEUM LIQUID STORAGE VESSELS) FOR WHICH CONSTRUCTION, RECONSTRUCTION, OR MODIFICATION COMMENCED AFTER JULY 23, 1984.

SUBPART Kb REQUIREMENTS
[40 CFR 60 Subparts A and Kb; WAQSR Ch 5, Sec 2 and Ch 6, Sec 2 Permit MD-11559]

The permittee shall meet all applicable requirements of 40 CFR 60 Subparts A and Kb and WAQSR Ch 5, Sec 2, as they apply to each storage vessel as defined under §60.110b, including the 1,000 bbl storage tanks, TNK001 (T1-T3).

STATUS: No issues were noted. Semiannual reports of all periods recorded under applicable requirements of Kb in which the pilot flame was absent, was furnished to the Administrator. FLR001 pilot outage was summarized in CRPT026561 during the

reporting period-included one outage occurred July 7, 2017 for the duration of 0.08 hours due to replacement of the blower motor. A pilot outage was summarized in CRPT022838 during the reporting period-included one outage occurred April 13, 2017 outage for duration of 5.6 hours due to a facility-wide ESD/Repairs.

The reports below have been accepted and placed into IMPACT.

SEMIANNUAL SUBPART Kb			
Report ID	**Received Date**	**Reporting Period**	**Report Title**
CRPT026561	**1/25/2017**	**7/1/ 2017–12/31/2017**	**40 CFR 60 Subpart Kb Semi-Annual**
CRPT022838	**7/31/2017**	**1/1/2017–6//30/2017**	**40 CFR 60 Subpart Kb Semi-Annual**

40 CFR 60 SUBPART JJJJ REQUIREMENTS FOR STATIONARY SPARK IGNITION INTERNAL COMBUSTION ENGINES

SUBPART JJJJ REQUIREMENTS
[40 CFR 60 Subparts A and JJJJ; WAQSR Ch 5, Sec 2 and Ch 6, Sec 2 Permit MD-11559]

As applicable, the permittee shall meet all applicable requirements of 40 CFR 60 Subparts A and JJJJ, and WAQSR Ch 5, Sec 2, as they apply to affected stationary spark ignition (SI) internal combustion engines (ICE). (As required by condition F6 (b), if an engine is replaced or reconstructed, subpart applicability will need to be reevaluated and a statement regarding applicability submitted to the Division.) For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. An affected source is defined at §60.4230.

STATUS: No issues were noted. Enterprise reports meeting all applicable requirements. On July 27, 2016, according to information submitted to the Division by the permittee, six Caterpillar G3612LE compressor engines, ENG001-ENG003, ENG006, ENG010, ENG012 (C1-C6); two Caterpillar G3412CLE generator engines, ENG009 and ENG011 (G3 and G4); and the Onan 7.5 JB emergency generator, ENG005 (Emerg), were not subject to Subpart JJJJ based on their date of construction and date of manufacture.

40 CFR 60 SUBPART OOOO REQUIREMENTS FOR CRUDE OIL AND NATURAL GAS PRODUCTION, TRANSMISSION AND DISTRIBUTION

SUBPART OOOO REQUIREMENTS
[40 CFR 60 Subparts A and OOOO; and WAQSR Ch 5, Sec 2]

The permittee shall meet all applicable requirements of 40 CFR 60 Subparts A and OOOO and WAQSR Ch 5, Sec 2, as they apply to affected facilities as specified under §60.5365.

STATUS: No issues were noted. The facility was constructed after 2012. Dates of periodic rod packing replacements were provided. Enterprise conducts inventory and tagging of affected facilities. An effective LDAR program is in place.

40 CFR 60 SUBPART OOOOa REQUIREMENTS FOR CRUDE OIL AND NATURAL GAS FACILITIES

SUBPART OOOOa REQUIREMENTS
[40 CFR 60 Subparts A and OOOOa; and WAQSR Ch 5, Sec 2]

The permittee shall meet all applicable requirements of 40 CFR 60 Subparts A and OOOOa and WAQSR Ch 5, Sec 2, as they apply to affected facilities as specified under §60.5365a.

STATUS: No issues were noted. Enterprise indicates greenhouse gas emissions in the form of methane, volatile organic compounds, sulfur dioxide are within the emission limits established by this subpart.

WAQSR CHAPTER 5, SECTION 3 NATIONAL EMISSIONS STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS) AND 40 CFR 63 SUBPART ZZZZ REQUIREMENTS FOR STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES

SUBPART ZZZZ REQUIREMENTS
[40 CFR 63 Subparts A and ZZZZ; WAQSR Ch 5, Sec 3; Ch 6, Sec 2 Permit MD-11559]

The permittee shall meet all applicable requirements of 40 CFR 63 Subparts A and ZZZZ and WAQSR Ch 5, Sec 3, as they apply to each affected source as indicated in §63.6590(a). An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand. (As required by condition F6 (b), if an engine is replaced or reconstructed, subpart applicability will need to be re-evaluated and a statement regarding applicability submitted to the Division.) This facility is currently identified as a major source of HAP emissions. Affected sources at this facility include the compressor engines, ENG001-ENG003, ENG006, ENG010 and ENG012 (C1-C6); the generator engines, ENG009 and ENG011 (G3 and G4); and the emergency generator, ENG005 (Emerg).

STATUS: No issues were noted. Enterprise is a major source of hazardous air pollutant emissions. Enterprise reports engines ENG001-ENG003, ENG006, ENG010, and ENG012 are being tested annually as required. ENG009 AND ENG011 are being tested every three (3) years as required. Engine replacements have been like kind. Enterprise has demonstrated initial and continuous compliance with the emission limitations and operating limits.

The following reports have been accepted and placed into IMPACT.

SEMIANNUAL SUBPART ZZZZ			
Report ID	**Received Date**	**Reporting Period**	**Report Title**
CRPT026404	**1/22/2018**	**7/1 – 12/31/2017**	**40 CFR 63 Subpart ZZZZ Semiannual Report**
CRPT022924	**7/31/2017**	**1/1 – 6/30/2017**	**40 CFR 63 Subpart ZZZZ Semiannual Report**

40 CFR 63 SUBPART DDDDD REQUIREMENTS FOR INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS AND PROCESS HEATERS

SUBPART DDDDD REQUIREMENTS
[40 CFR 63 Subparts A and DDDDD; and WAQSR Ch 5, Sec 3]

The permittee shall meet all applicable requirements of 40 CFR 63 Subparts A and DDDDD and WAQSR Ch 5, Sec 3, as they apply to owners or operators of industrial, commercial, or institutional boilers or process heaters as defined in §63.7575 that are located at, or are part of, a major source of HAPs as defined in §63.2, except that for oil and natural gas production facilities, a major source of HAPS is as defined in §63.761 (40 CFR 63 Subpart HH). The types of boilers and process heaters listed in §63.7491 are not subject to Subpart DDDDD. This subpart applies to:

(a) The collection of existing industrial, commercial, and institutional boilers and process heaters within a subcategory, including the 1.706 MMBtu/hr stabilizer heater, HET001 (H1), and the 1.584 MMBtu/hr fuel gas heater, HET002 (H2).

(b) New or reconstructed industrial, commercial, or institutional boilers or process heaters.

STATUS: No issues were noted. Luman Compressor Station is a major source of HAPs. The stabilizer and fuel gas heaters (unit HET001 and HET002) are fuel-burning equipment. These units are uncontrolled and have a combined potential to emit less than 1.5 tons per year of NO_X.

WAQSR CHAPTER 7, SECTION 3 COMPLIANCE ASSURANCE MONITORING (CAM) REQUIREMENTS

(CAM-1) COMPLIANCE ASSURANCE MONITORING REQUIREMENTS
[WAQSR Ch 7, Sec 3(b) and (c)]

The permittee shall follow the CAM plan attached as Appendix C of this permit and meet all CAM requirements of WAQSR Chapter 7, Section 3 as they apply to the combustion chamber, FLR001/FLA001 (CU-1). All CAM requirements in this permit apply upon permit issuance. Compliance with the source specific monitoring, recordkeeping, and reporting requirements of this permit meets the monitoring, recordkeeping, and reporting

requirements of WAQSR Ch 7, Sec 3, except for additional requirements specified under conditions CAM-2 through CAM-4.

(CAM-2) OPERATION OF APPROVED MONITORING
[WAQSR Ch 7, Sec 3(g)]

(a) At all times, the permittee shall maintain the monitoring under this section, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(b) Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities, the permittee shall conduct all monitoring in continuous operation (or at all required intervals) at all times that the pollutant specific emissions unit is operating.

(c) Upon detecting an excursion, the permittee shall restore operation of the pollutant-specific emission unit to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices. The response shall include minimizing the period of any start-up, shutdown or malfunction and taking any corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion.

(d) If the permittee identifies a failure to achieve compliance with an emission limit for which the monitoring did not provide an indication of an excursion while providing valid data, or the results of compliance or performance testing documents a need to modify the existing indicator ranges, the permittee shall promptly notify the Division and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes.

(CAM-3) QUALITY IMPROVEMENT PLAN (QIP) REQUIREMENTS
[WAQSR Ch 7, Sec 3(h)]

(a) If the Division or the EPA Administrator determines, based on available information, that the permittee has used unacceptable procedures in response to an excursion or exceedance, the permittee may be required to develop and implement a Quality Improvement Plan (QIP).

(b) If required, the permittee shall maintain a written Quality Improvement Plan (QIP) and have it available for inspection.

(c) The plan shall include procedures for conducting one or more of the following:
(i) Improved preventative maintenance practices.
(ii) Process operation changes.
(iii) Appropriate improvements to control methods.
(iv) Other steps appropriate to correct control.
(v) More frequent or improved monitoring (in conjunction with (i) - (iv) above).

(d) If a QIP is required, the permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the Division if the period for completing the QIP exceeds 180 days from the date, on which the need to implement the QIP was determined.

(e) Following implementation of a QIP, upon any subsequent determination under paragraph (a) above, the Division may require the permittee to make reasonable changes to the QIP if the QIP failed to address the cause of control device problems, or failed to provide adequate procedures for correcting control device problems as expeditiously as practicable.

(f) Implementation of a QIP shall not excuse the permittee from compliance with any existing emission limit(s) or any existing monitoring, testing, reporting, or recordkeeping requirements that may be applicable to the facility.

(CAM-4) SAVINGS PROVISIONS
[WAQSR Ch 7, Sec 3(j)]

Nothing in the CAM regulations shall excuse the permittee from compliance with any existing emission limit or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may be applicable to the facility.

STATUS: No issues were noted. Enterprise demonstrated compliance with the conditions of the CAM. Enterprise completed the source specific monitoring, recordkeeping, and reporting requirements of their permit by meeting the monitoring, recordkeeping, and reporting requirements of WAQSR Ch 7, Sec 3. Additional requirements specified under conditions of CAM-1 through CAM-4 were met and in accordance with Enterprise Operating Plan and VOC Compliance Assurance Monitoring (CAM) Plan.

COMPLIANCE CERTIFICATION AND SCHEDULE

Compliance Certification
[WAQSR Ch 6, Sec 3(h)(iii)(E)]

(C1) (a) The permittee shall submit by January 31 each year a certification addressing compliance with the requirements of this permit. The certification shall be submitted as a stand-alone document separate from any monitoring reports required under this permit.

(b) (i) For fugitive equipment leak VOC emissions, the permittee shall assess compliance with condition F2 of this permit by conducting the monitoring required by condition F13 and by reviewing the records kept in accordance with condition F18.

(ii) For visible emissions from the combustion chamber, FLR001/FLA001 (CU-1) the permittee shall assess compliance with condition F3 (a) by conducting the monitoring required by condition F8(c).

(iii) For the emergency flare, FLR002 (EF-1), the permittee shall assess compliance with the visible emissions limit in condition F3 (a) and the operational requirement in condition F5 (h) by conducting the monitoring specified in condition F10 (a) and reviewing records kept in accordance with conditions F15(c) and (d).

(iv) For visible emissions from other sources, the permittee shall assess compliance with condition F3 (b) by conducting the monitoring required by conditions F8 (a) and (b).

(v) For NO_X, CO, VOC and formaldehyde emissions from the engines, the permittee shall assess compliance with conditions F4 (a) and (c) by conducting the testing and monitoring required by conditions F9 (a) and F11.

(vi) For NO_X, CO, and VOC emissions from the combustion chamber, FLR001/FLA001 (CU-1), the permittee shall assess compliance with conditions F4(a) and F5(g) by conducting the monitoring required by condition F9(b) and the CAM for VOC emissions required by condition F12.

(vii) For the distance piece vent VOC emission rate, the permittee shall assess compliance with condition F4 (e) of this permit by conducting the monitoring required by condition F9(c) and reviewing the records kept in accordance with condition F14 (f).

(viii) For the engine operations and maintenance requirements, the permittee shall assess compliance with conditions F5 (a) and (b) by reviewing the records kept in accordance with condition F16.

(ix) For the operating hours limitations for the emergency generator, ENG005 (Emerg), and the two generator engines, ENG009 and ENG011 (G3 and G4), the permittee shall assess compliance with conditions F5 (b) and (c) of this permit by reviewing the records required by condition F15 (a).

(x) For the compressor starter requirements, the permittee shall assess compliance with condition F5(d) by reviewing the records kept in accordance with condition F15(b).

(xi) For the condensate storage tanks, TNK001 (T1-T3), control requirements, the permittee shall assess compliance with conditions F5(e)-(g) by conducting the monitoring required by condition F12, by reviewing records kept in accordance with condition F17, and verifying that vapors from condensate flashing are routed to the smokeless combustion chamber FLR001/FLA001 (CU-1).

(xii) The permittee shall certify that the vapors from the condensate flash tank, stabilizer tower, and safety relief devises are routed as specified in condition F5 (h).

(xiii) For greenhouse gas reporting, the permittee shall assess compliance with condition F23 by verifying that reports were submitted in accordance with condition F23 (a) and (b).

(xiv) For the three 1,000 bbl condensate storage tanks, TNK001 (T1-T3), the permittee shall assess compliance with Subpart Kb by conducting any testing and monitoring required by §§60.113b and 60.116b, and by reviewing the records required by §§60.115b and 60.116b.

(xv) For any engine subject to 40 CFR 60 Subpart JJJJ, the permittee shall assess compliance with Subpart JJJJ by conducting any applicable testing and monitoring required by §§60.4237, 60.4243, and 60.4244, and by reviewing the records required by §§60.4245 and 60.4246.

(xvi) For any affected facility subject to 40 CFR 60 Subpart OOOO, the permittee shall assess compliance with Subpart OOOO by conducting any applicable testing and monitoring required by §§60.5413 through 60.5417 and by reviewing any applicable records required by §60.5420.

(xvii) For any affected facility subject to 40 CFR 60 Subpart OOOOa, the permittee shall assess compliance with Subpart OOOOa by conducting any applicable testing and monitoring required by §§60.5410a through 60.5417a and by reviewing any applicable records required by §60.5420a.

(xviii) For the engines, ENG001-ENG003, ENG006, ENG010 and ENG012 (C1-C6); ENG009 and ENG011 (G3 and G4); and ENG005 (Emerg), the permittee shall assess compliance with 40 CFR 63 Subpart ZZZZ by conducting any testing and monitoring required by §§63.6610 through 63.6640 and by reviewing the records required by §§63.6655 and 63.6665.

(xix) For the heaters, HET001 and HET002 (H1 and H2), the permittee shall assess compliance with 40 CFR 63 Subpart DDDDD by conducting any applicable testing and monitoring required by §§63.7505 through 63.7541 and by reviewing any records required by §§63.7555 and 63.7560.

(c) The compliance certification shall include:

(i) The permit condition or applicable requirement that is the basis of the certification;
(ii) The current compliance status;
(iii) Whether compliance was continuous or intermittent; and
(iv) The methods used for determining compliance.

(d) For any permit conditions or applicable requirements for which the source is not in compliance, the permittee shall submit with the compliance certification a proposed compliance plan and schedule for Division approval.

(e) The compliance certification shall be submitted to the Division in accordance with condition G4 of this permit and to the Assistant Regional Administrator, Office of Enforcement, Compliance, and Environmental Justice (8ENF-T), U.S. EPA - Region VIII, 1595 Wynkoop Street, Denver, CO 80202-1129.

(f) Determinations of compliance or violations of this permit are not restricted to the monitoring requirements listed in paragraph (b) of this condition; other credible evidence may be used.

STATUS: No issues were noted. Annual 2017 Compliance Certification was received from Enterprise by January 31, 2018. Initial certification was not accepted into

IMPACT. Upon request for corrections, a corrected certification was resubmitted February 6, 2018. Certification by the operator showed continuous compliance with the permit conditions having an exception of intermittent compliance with the following conditions:

- **F9(a), intermittent compliance with emissions testing and monitoring.**
- **F11(a)(b)(c), intermittent compliance with engine catalyst monitoring and maintenance. Units C1-C6, G3 and G4 inlet temperature. Deviations from pressure drop monitoring.**
- **F12(a), intermittent compliance with CAM. CU-1 pilot flame downtime reported in Monitoring and Deviation report.**
- **F14(e), intermittent compliance with emission testing and monitoring. DP for C5 was not recorded during September 2017.**
- **F21, monitoring report CRPT026775, for reporting period July 1, 2017 through December 31, 2017, Trihydro referenced wrong permit and conditions.**
    - **Report did not include the ZZZZ SAR. Deviation: Unit C5 pressure drop was not collected.**
- **ZZZZ (NESHAP), intermittent compliance, deviations submitted on a separate report. Reviewed CRPT026404 (ZZZZ) and could not identify deviations in the report.**

The Certification of Truth, Accuracy, and Completeness was certified by responsible official Ivan Zirbes, Vice President.

The following report has been submitted and is accepted into IMPACT.

C1 – ANNUAL COMPLIANCE CERTIFICATION			
Report ID	**Received Date**	**Reporting Period**	**Report Title**
CRPT026774	**1/29/2018**	**1/1 – 12/31/2017**	**Annual Compliance Certification 2017**

Compliance Schedule
[WAQSR Ch 6, Sec 3(h)(iii)(C) and (D)]

(C2) The permittee shall continue to comply with the applicable requirements with which the permittee has certified that it is already in compliance.

(C3) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.

STATUS: No issues were noted.

GENERAL PERMIT CONDITIONS

Powers of the Administrator:
[W.S. 35-11-110]

(G1) (a) The Administrator may require the owner or operator of any point source to complete plans and specifications for any application for a permit required by the Wyoming Environmental Quality Act or regulations made pursuant thereto and require the submission of such reports regarding actual or potential violations of the Wyoming Environmental Quality Act or regulations thereunder.

(b) The Administrator may require the owner or operator of any point source to establish and maintain records; make reports; install, use and maintain monitoring equipment or methods; sample emissions, or provide such other information as may be reasonably required and specified.

Permit Renewal and Expiration:
[WAQSR Ch 6, Sec 3(c)(i)(C), (d)(ii), (d)(iv)(B), and (h)(i)(B)] [W.S. 35-11-206(f)]

(G2) This permit is issued for a fixed term of five years. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted at least six months prior to the date of permit expiration. If the permittee submits a timely and complete application for renewal, the permittee's failure to have an operating permit is not a violation of WAQSR Chapter 6, Section 3 until the Division takes final action on the renewal application. This protection shall cease to apply after a completeness determination if the applicant fails to submit by the deadline specified in writing by the Division any additional information identified as being needed to process the application.

Duty to Supplement:
[WAQSR Ch 6, Sec 3(c)(iii)]

(G3) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after this permit is issued.

Submissions:
[WAQSR Ch 6, Sec 3(c)(iv)] [W.S. 35-11-206(c)]

(G4) Any application form, report, or certification submitted shall be certified as being true, accurate, and complete by a responsible official.

(a) Submissions to the Division including reports, certifications, and emission inventories required under this permit shall be submitted either:

(i) Electronically through the Division's IMPACT system (https://airimpact.wyo.gov); or

(ii) As separate, stand-alone documents sent to:

Administrator, Air Quality Division

Department of Environmental Quality
200 West 17th Street
Cheyenne, Wyoming 82002

(b) Submissions to EPA.

(i) Each certification required under condition C1 of this permit shall also be sent to:

Assistant Regional Administrator
Office of Enforcement, Compliance, and Environmental Justice (8ENF-T)
U.S. EPA - Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129.

(ii) All other required submissions to EPA shall be sent to:

Office of Partnerships and Regulatory Assistance
Air and Radiation Program (8P-AR)
U.S. EPA - Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

Changes for Which No Permit Revision Is Required:
[WAQSR Ch 6, Sec 3(d)(iii)]

(G5) The permittee may change operations without a permit revision provided that:

(a) The change is not a modification under any provision of title I of the Clean Air Act;

(b) The change has met the requirements of Chapter 6, Section 2 of the WAQSR and is not a modification under Chapter 5, Section 2 or Chapter 6, Section 4 of the WAQSR and the changes do not exceed the emissions allowed under the permit (whether expressed therein as a rate of emissions or in terms of total emissions); and

(c) The permittee provides EPA and the Division with written notification at least 14 days in advance of the proposed change. The permittee, EPA, and the Division shall attach such notice to their copy of the relevant permit. For each such change, the written notification required shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield, if one exists for this permit, shall not apply to any such change made.

Transfer of Ownership or Operation:
[WAQSR Ch 6, Sec 3(d)(v)(A)(IV)]

(G6) A change in ownership or operational control of this facility is treated as an administrative permit amendment if no other change in this permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Division.

Reopening for Cause:
[WAQSR Ch 6, Sec 3(d)(vii)] [W.S. 35-11-206(f)(ii) and (iv)]

(G7) The Division will reopen and revise this permit as necessary to remedy deficiencies in the following circumstances:

(a) Additional applicable requirements under the Clean Air Act or the WAQSR that become applicable to this source if the remaining permit term is three or more years. Such reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended.

(b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit.

(c) The Division or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

(d) The Division or EPA determines that the permit must be revised or revoked to assure compliance with applicable requirements.

Annual Fee Payment:
[WAQSR Ch 6, Sec 3(f)(i), (ii), and (vi)] [W.S. 35-11-211]

(G8) The permittee shall, as a condition of continued operations, submit an annual fee to the Division as established in Chapter 6, Section 3 (f) of the WAQSR. The Division shall give written notice of the amount of fee to be assessed and the basis for such fee assessment annually. The assessed fee is due on receipt of the notice unless the fee assessment is appealed pursuant to W.S. 35-11-211(d). If any part of the fee assessment is not appealed it shall be paid to the Division on receipt of the written notice. Any remaining fee which may be due after completion of the appeal is immediately due and payable upon issuance of the Council's decision. Failure to pay fees owed the Division is a violation of Chapter 6, Section 3 (f) and W.S. 35-11-203 and may be cause for the revocation of this permit.

Annual Emissions Inventories:
[WAQSR Ch 6, Sec 3(f)(v)(G)]

(G9) The permittee shall submit an annual emission inventory for this facility to the Division for fee assessment and compliance determinations within 60 days following the end of the calendar year. The emissions inventory shall be in a format specified by the Division and be submitted in accordance with condition G4(a) of this permit.

Severability Clause:
[WAQSR Ch 6, Sec 3(h)(i)(E)]

(G10) The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the

application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

Compliance:
[WAQSR Ch 6, Sec 3(h)(i)(F)(I) and (II)] [W.S. 35-11-203(b)]

(G11) The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Air Act, Article 2 of the Wyoming Environmental Quality Act, and the WAQSR and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

Permit Actions:
[WAQSR Ch 6, Sec 3(h)(i)(F)(III)] [W.S. 35-11-206(f)]

(G12) This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Property Rights:
[WAQSR Ch 6, Sec 3(h)(i)(F)(IV)]

(G13) This permit does not convey any property rights of any sort, or any exclusive privilege.

Duty to Provide Information:
[WAQSR Ch 6, Sec 3(h)(i)(F)(V)]

(G14) The permittee shall furnish to the Division, within a reasonable time, any information that the Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Division copies of records required to be kept by the permit, including information claimed and shown to be confidential under W.S. 35-11-1101 (a) of the Wyoming Environmental Quality Act. Upon request by the Division, the permittee shall also furnish confidential information directly to EPA along with a claim of confidentiality.

Emissions Trading:
[WAQSR Ch 6, Sec 3(h)(i)(H)]

(G15) No permit revision is required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

Inspection and Entry:
[WAQSR Ch 6, Sec 3(h)(iii)(B)] [W.S. 35-11-206(c)]

(G16) Authorized representatives of the Division, upon presentation of credentials and other documents as may be required by law, shall be given permission to:

(a) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) have access to and copy at reasonable times any records that must be kept under the conditions of this permit;

(c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) sample or monitor any substances or parameters at any location, during operating hours, for the purpose of assuring compliance with this permit or applicable requirements.

Excess Emissions Due to an Emergency:

[WAQSR Ch 6, Sec 3(l)]

(G17) The permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency, as defined in Ch 6, Sec 3(l)(i) of the WAQSR. To do so, the permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:

(a) an emergency occurred and that the permittee can identify the cause(s) of the emergency;

(b) the permitted facility was, at the time, being properly operated;

(c) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit;

(d) The permittee submitted notice of the emergency to the Division within one working day of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

Diluting and Concealing Emissions:
[WAQSR Ch 1, Sec 4]

(G18) No person shall cause or permit the installation or use of any device, contrivance, or operational schedule which, without resulting in reduction of the total amount of air contaminant released to the atmosphere, shall dilute or conceal an emission from a source. This condition shall not apply to the control of odors.

Unavoidable Equipment Malfunction:
[WAQSR Ch 1, Sec 5]

(G19) (a) Any source believing that any emissions in excess of established regulation limits or standards resulted from an unavoidable equipment malfunction, shall notify the Division within 24 hours of the incident via telephone, electronic mail, fax, or other similar method. A detailed description of the circumstances of the incident as described in paragraph 5(a)(i)(A) Chapter 1, including a corrective program directed at preventing future such incidents, must be submitted within 14 days of the onset of the incident. The Administrator may extend this 14-day time period for cause.

(b) The burden of proof is on the owner or operator of the source to provide sufficient information to demonstrate that an unavoidable equipment malfunction occurred.

Fugitive Dust:
[WAQSR Ch 3, Sec 2(f)]

(G20) The permittee shall minimize fugitive dust in compliance with standards in Ch 3, Sec 2(f) of WAQSR for construction/demolition activities, handling and transportation of materials, and agricultural practices.

Carbon Monoxide:
[WAQSR Ch 3, Sec 5]

(G21) The emission of carbon monoxide in stack gases from any stationary source shall be limited as may be necessary to prevent ambient standards from being exceeded.

Asbestos:
[WAQSR Ch 3, Sec 8]

(G22) The permittee shall comply with emission standards for asbestos during abatement, demolition, renovation, manufacturing, spraying and fabricating activities.

(a) No owner or operator shall build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous dilutants to achieve compliance with a visible emissions standard, and the piecemeal carrying out of an operation to avoid coverage by a standard that applies only to operations larger than a specified size.

(b) All owners and operators conducting an asbestos abatement project, including an abatement project on a residential building, shall be responsible for complying with Federal requirements and State standards for packaging, transportation, and delivery to an approved waste disposal facility as provided in paragraph (m) of Ch 3, Sec 8.

(c) The permittee shall follow State and Federal standards for any demolition and renovation activities conducted at this facility, including:

(i) A thorough inspection of the affected facility or part of the facility where the demolition or renovation activity will occur shall be conducted to determine the presence of asbestos, including Category I and Category II non-friable asbestos

containing material. The results of the inspection will determine which notification and asbestos abatement procedures are applicable to the activity.

(ii) The owner or operator shall follow the appropriate notification requirements of Ch 3, Sec 8(i)(ii).

(iii) The owner or operator shall follow the appropriate procedures for asbestos emissions control, as specified in Chapter 3, Section 8(i)(iii).

(d) No owner or operator of a facility may install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. The provisions of this paragraph do not apply to spray-applied insulating materials regulated under paragraph (j) of Ch 3, Sec 8.

(e) The permittee shall comply with all other requirements of WAQSR Ch 3, Sec 8.

Open Burning Restrictions:
[WAQSR Ch 10, Sec 2]

(G23) The permittee conducting an open burn shall comply with all rules and regulations of the Wyoming Department of Environmental Quality, Division of Air Quality, and with the Wyoming Environmental Quality Act.

(a) No person shall burn prohibited materials using an open burning method, except as may be authorized by permit. ***"Prohibited materials"*** means substances including, but not limited to; natural or synthetic rubber products, including tires; waste petroleum products, such as oil or used oil filters; insulated wire; plastic products, including polyvinyl chloride ("PVC") pipe, tubing and connectors; tar, asphalt, asphalt shingles, or tar paper; railroad ties; wood, wood waste, or lumber that is painted or chemically treated; explosives or ammunition; batteries; hazardous waste products; asbestos or asbestos containing materials; or materials which cause dense smoke discharges, excluding refuse and flaring associated with oil and gas well testing, completions and well workovers.

(b) No person or organization shall conduct or cause or permit open burning for the disposal of trade wastes, for a salvage operation, for the destruction of fire hazards if so designated by a jurisdictional fire authority, or for firefighting training, except when it can be shown by a person or organization that such open burning is absolutely necessary and in the public interest. Any person or organization intending to engage in such open burning shall file a request to do so with the Division.

Sulfur Dioxide Emission Trading and Inventory Program
[WAQSR Ch 14]

(G24) Any BART (Best Available Retrofit Technology) eligible facility, or facility which has actual emissions of SO_2 greater than 100 tpy in calendar year 2000 or any subsequent year, shall comply with the applicable requirements of WAQSR Ch 14, Sections 1 through 3, with the exceptions described in sections 2(c) and 3(a).

Stratospheric Ozone Protection Requirements:
[40 CFR 82]

(G25) The permittee shall comply with all applicable Stratospheric Ozone Protection Requirements, including but not limited to:

(a) *Standards for Appliances* [40 CFR 82, Subpart F]
The permittee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR 82, Subpart F - Recycling and Emissions Reduction, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:

(i) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.

(ii) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.

(iii) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.

(iv) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like appliance" is defined at §82.152).

(v) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.166.

(vi) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

(vii) The permittee shall comply with all other requirements of Subpart F.

(b) *Standards for Motor Vehicle Air Conditioners* [40 CFR 82, Subpart B]
If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

STATUS: No issues were noted. Enterprise demonstrated compliance with this conditions G1 through G25. Certification of Truth, Accuracy, and Completeness was certified by Ivan Zirbes, Vice President. Enterprise stated in their Annual Compliance Certifications that they have complied with general permit conditions (G1) through (G25).

In accordance with permit condition G19, the Division was notified within 24 hours of an unavoidable equipment malfunction via telephone and electronic mail as documented in COR063587. CRPT025181 compliance reports a detailed description of the incident and corrective program were submitted within 14 days of the onset of the incident.

G19 – EXCESS EMISSIONS DUE TO UNAVOIDABLE EQUIPMENT MALFUNCTION					
Report ID	**Received Date**	**Malfunction Date**	**Description**	**VOC (tons/event)**	**Emissions (Mscf)**
COR063587	**11/10/2017**	**11/10/2017**	**ESD, Compressor Shutdown – 24 hr notice**	**--**	**--**
CRPT025181	**11/20/2017**	**11/10/2017**	**ENG001, PSV Release**	**0.0125**	**0.475**

STATE ONLY PERMIT CONDITIONS

The conditions listed in this section are State only requirements and are not federally enforceable.

Ambient Standards

(S1) The permittee shall operate the emission units described in this permit such that the following ambient standards are not exceeded:

POLLUTANT	STANDARD*	CONDITION	WAQSR CH. 2, SEC.
PM_{10} particulate matter	50 micrograms per cubic meter	annual arithmetic mean	2 (a)
	150 micrograms per cubic meter	24-hr average concentration with not more than one exceedance per year	
$PM_{2.5}$ particulate matter	12.0 micrograms per cubic meter	annual arithmetic mean	2 (b) & (c)
	15 micrograms per cubic meter	annual arithmetic mean	
	35 micrograms per cubic meter	98th percentile 24-hr average concentration	
Nitrogen dioxide	53 parts per billion	annual average concentration	3
	100 parts per billion	three-year average of the annual 98th percentile of the daily maximum 1-hr average concentration	
	0.053 parts per million	annual arithmetic mean	
Sulfur dioxide	75 parts per billion	three-year average of the annual (99th percentile) of the daily max 1-hr average	4
	0.5 parts per million	3-hr blocks not to be exceeded more than once per calendar year	
Carbon monoxide	10 milligrams per cubic meter	max 8-hr concentration with not more than one exceedance per year	5
	40 milligrams per cubic meter	max 1-hr concentration with not more than one exceedance per year	
Ozone	0.075 parts per million	three-year average of the annual fourth-highest daily maximum 8-hr average concentration	6

Hydrogen sulfide	70 micrograms per cubic meter	½ hour average not to be exceeded more than two times per year	7
	40 micrograms per cubic meter	½ hour average not to be exceeded more than two times in any five consecutive days	
Suspended sulfate	0.25 milligrams SO_3 per 100 square centimeters per day	maximum annual average	8
	0.50 milligrams SO_3 per 100 square centimeters per day	maximum 30-day value	
Lead and its compounds	0.15 micrograms per cubic meter	maximum arithmetic 3-month mean concentration for a 3-year period	10

*Exceedances of these standards shall be determined using the procedures in 40 CFR 50.

Hydrogen Sulfide: [WAQSR Ch 3, Sec 7]

(S2) Any exit process gas stream containing hydrogen sulfide which is discharged to the atmosphere from any source shall be vented, incinerated, flared or otherwise disposed of in such a manner that ambient sulfur dioxide and hydrogen sulfide standards are not exceeded.

Odors: [WAQSR Ch 2, Sec 11]

(S3) (a) The ambient air standard for odors from any source shall be limited to an odor emission at the property line which is undetectable at seven dilutions with odor free air as determined by a scentometer as manufactured by the Barnebey-Cheney Company or any other instrument, device, or technique designated by the Division as producing equivalent results. The occurrence of odors shall be measured so that at least two measurements can be made within a period of one hour, these determinations being separated by at least 15 minutes.

(b) Odor producing materials shall be stored, transported, and handled in a manner that odors produced from such materials are confined and that accumulation of such materials resulting from spillage or other escape is prevented.

STATUS: No issues were noted. Enterprise demonstrated compliance with conditions S1 through S3 of this permit. The Annual Compliance Certification indicates compliance with the State only conditions for Ambient Standards (S1), Hydrogen Sulfide (S2), and Odors (S3). There were no concerns with odors during this inspection.

FACILITY INSPECTION SUMMARY

Once the records and permit review were complete around 10:30 am, we headed to the compressor station. Facility representatives met me at the facility at 11:00 am. Facility representatives included Brian Stone, Jim Pilon, Pat Abbot, Ray Pape, Elmer Eaker, Jordan Kowart, and Trevor Greenwald. Ambient conditions at the time of facility inspection were sunny, approximately 36 degrees Fahrenheit (36°F) and partly cloudy. Signage at the facility identified this facility as Enterprise Products Falcon Compressor Station.

I walked through the entire facility. The walk through inspection included observations of the different equipment and sources at the facility. Flow into this facility comes from the Falcon Compressor Station and Anticline. The gas comes into a slug catcher then to a verticle two-phase separator. Any residual moisture falls out and the gas goes into the flash tank where higher ends flash off and the condensate liquids go to the 1000 barrel condensate tanks. The tanks vapors are controlled using blanket gas in addition to the combustion chamber. Any tank vapors will go to a knockout prior to reaching the combustion chamber to remove any residual liquids. The tanks are emptied using a truck loadout station next to the tanks, the truck loadout was not active at the time of the inspection. The Hot Oil heater and Stabilizer are not in use at this time because they are used in conjunction with the VRU. The VRU was observed to be on site but was disconnected. The facility appeared to be well maintained.

Operating status of each permitted source during the time of this inspection is shown in the table below. Emission sources appeared to be in good operating condition. Elmer Eaker and Jordan Kowart escorted me through the facility to observe all permitted sources. Photographs of sources observed during the inspection are included in Appendix A. The plant was configured as permitted. The table below establishes the operating status of each emission unit at the time of this inspection.

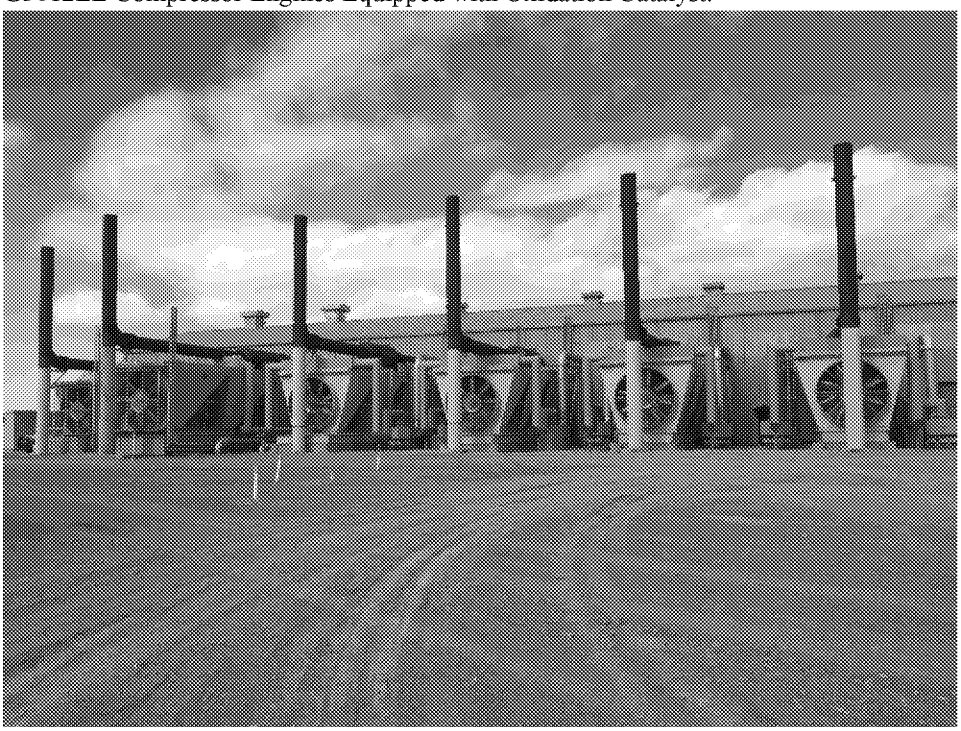
SOURCE INVENTORY AND STATUS				
Source ID	**Source Description**	**Size**	**Serial Number**	**Operating Status**
ENG001 (C1)	Caterpillar G3612LE Compressor Engine	3668 hp	BKE00270	Operating
ENG002 (C2)	Caterpillar G3612LE Compressor Engine	3668 hp	BKE00250	Operating
ENG003 (C3)	Caterpillar G3612LE Compressor Engine	3668 hp	1YG00156	Operating
ENG006 (C4)	Caterpillar G3612LE Compressor Engine	3668 hp	1YG00069	Shutdown
ENG010 (C5)	Caterpillar G3612LE Compressor Engine	3668 hp	BKE00251	Operating
ENG012 (C6)	Caterpillar G3612LE Compressor Engine	3668 hp	BKE00223	Operating
ENG009 (G3)	Caterpillar 3516B LE Generator Engine	1800 hp	CTP00309	Inactive
ENG011 (G4)	Caterpillar 3516B LE Generator Engine	1800 hp	CTP02392	Inactive
VRU	VRU Compressor is Electric Driven	--	--	Disconnected
ENG005 (Emerg)	Onan 7.5 JB Emergency Generator	14 hp	--	Inactive
FLR001 (CU-1)	TCI 4000 Combustion Chamber	N/A	--	Operating
FLR002 (EF-1)	Process Flare	55 MMscf/yr	--	Operating
HET001 (H1)	Stabilizer Heater (indirect heat)	1.706 MMBtu/hr	--	Operating
HET002 (H2)	Fuel Gas Heater (indirect heat)	1.584 MMBtu/hr	--	Operating

TNK001 (T1-T3)	(3) Horizontal Storage Tanks	1000 bbl ea	--	Active
FUG004 (RPV)	Distance Piece (a.k.a. Compressor CylinderRod Packing Vents) Leaks	--	--	Active
FUG001 (F-1)	Fugitive Emissions	--	--	NA
LUD001 (L-1)	Truck Loading	--	--	Inactive
PNE001 (P-1)	Pneumatic Controllers	--	--	Operating
FUG003 (PG)	Pigging Activities	--	--	Inactive
BVC001 (BD)	Compressor Blowdown	--	--	NA

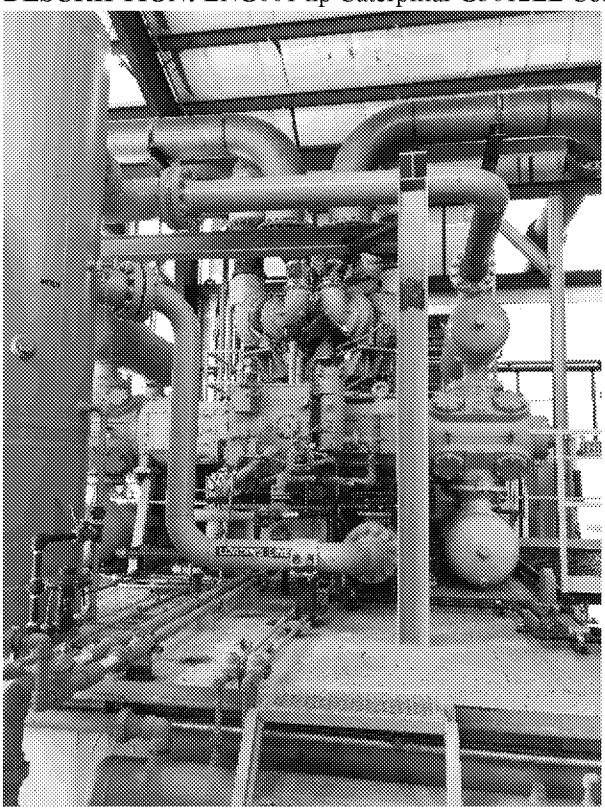
APPENDIX A – PHOTOGRAPHS

PHOTOGRAPHER: Etcheverry **DATE TAKEN:** 2/14/2018 **PHOTO #:** 1
DESCRIPTION: Facility Identification

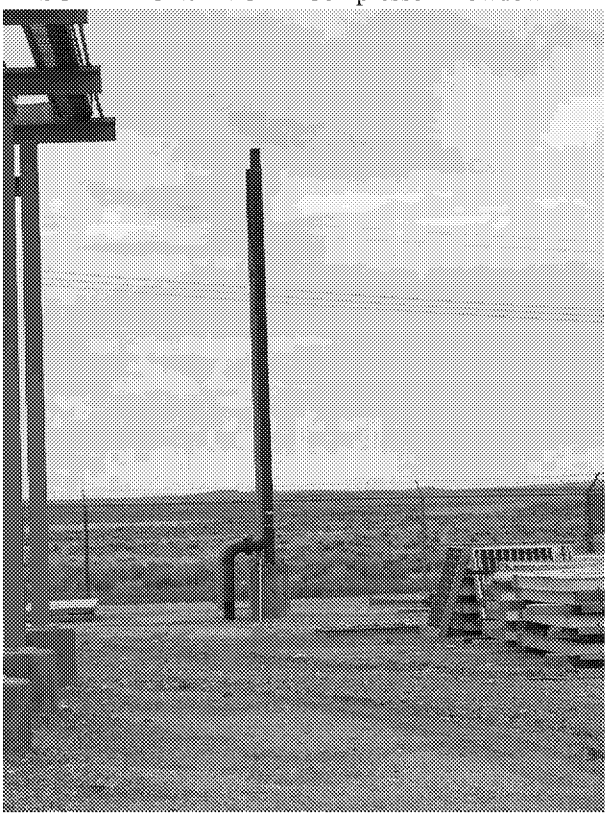
PHOTOGRAPHER: Etcheverry **DATE TAKEN:** 2/14/2018 **PHOTO #:** 2
DESCRIPTION: ENG001, ENG002, ENG003, ENG006, ENG010, ENG012, ENG011 3668 hp Caterpillar G3612LE Compressor Engines Equipped with Oxidation Catalyst.



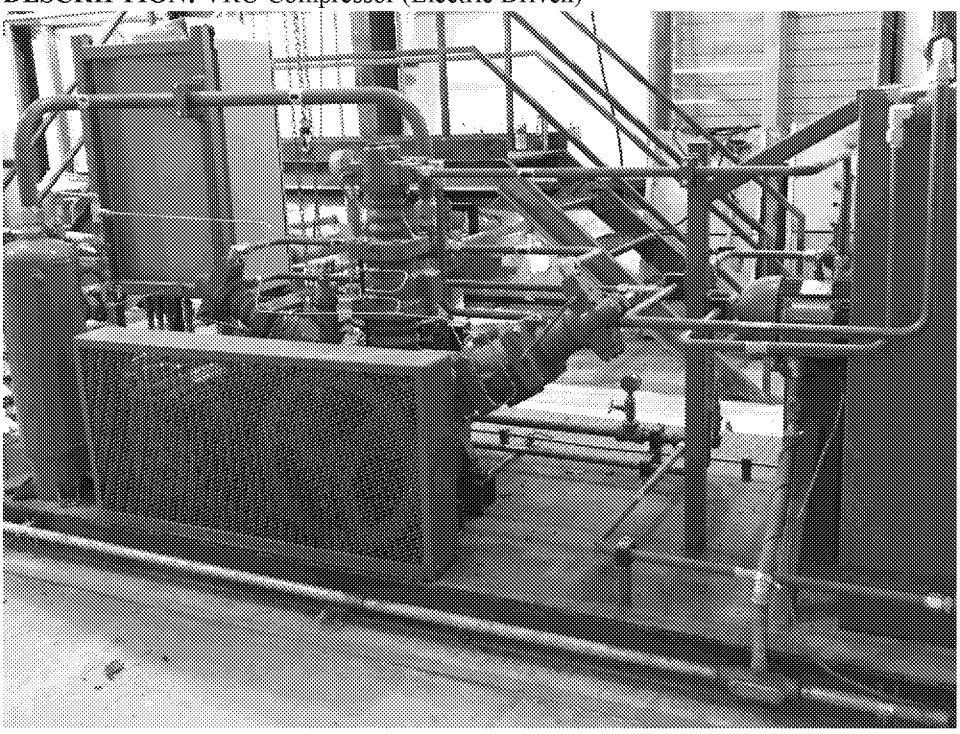
PHOTOGRAPHER: Etcheverry **DATE TAKEN:** 7/19/2017 **PHOTO #:** 3
DESCRIPTION: ENG001 hp Caterpillar G3612LE Compressor Engine



PHOTOGRAPHER: Etcheverry **DATE TAKEN:** 7/19/2017 **PHOTO #:** 4
DESCRIPTION: BVC001 Compressor Blowdown

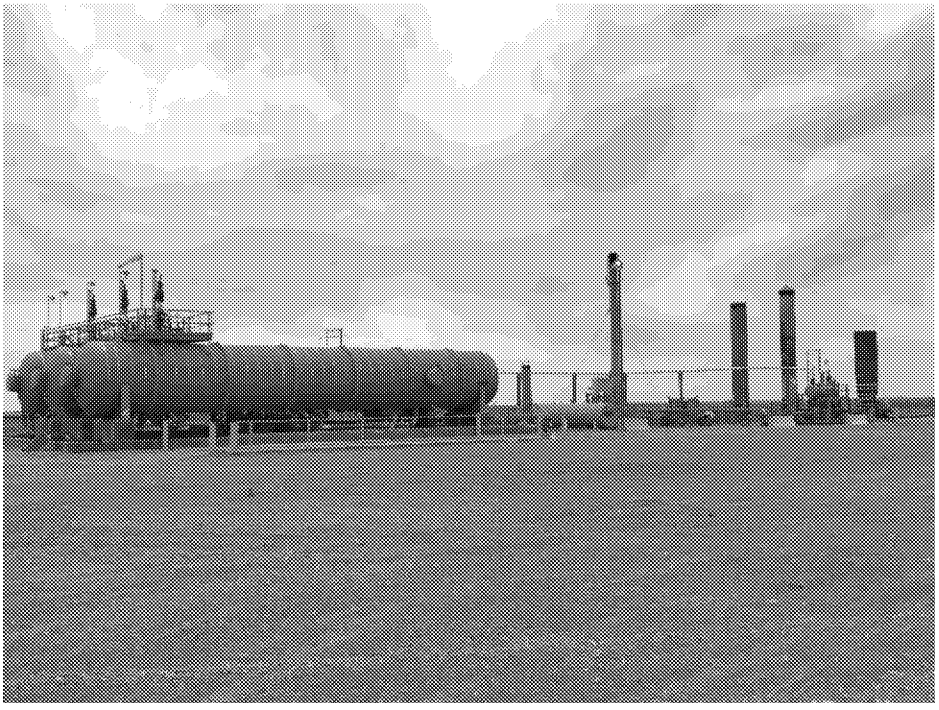


PHOTOGRAPHER: Etcheverry **DATE TAKEN:** 7/19/2017 **PHOTO #:** 5
DESCRIPTION: VRU Compressor (Electric Driven)

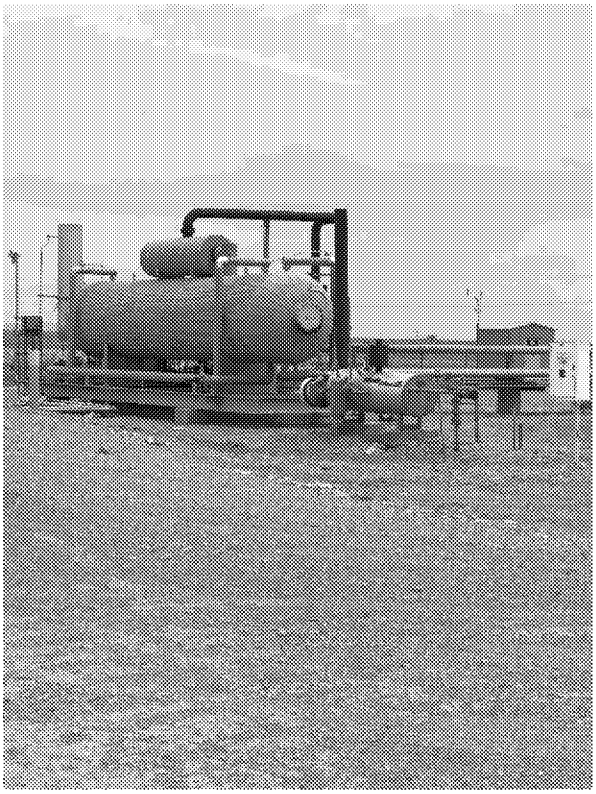


PHOTOGRAPHER: Etcheverry **DATE TAKEN:** 7/19/2017 **PHOTO #:** 6
DESCRIPTION: ENG005 14 hp Onan 7.5 JB Emergency Generator

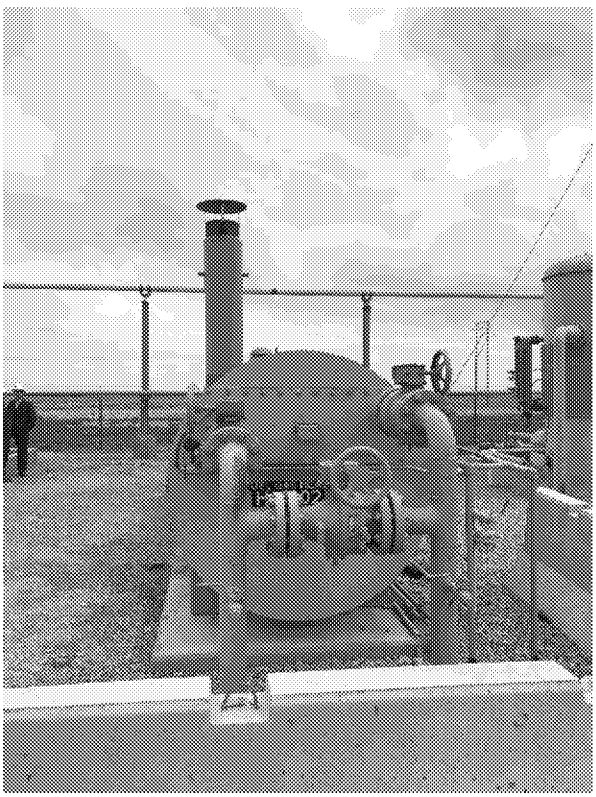
PHOTOGRAPHER: Etcheverry **DATE TAKEN:** 7/19/2017 **PHOTO #:** 7
DESCRIPTION: TNK001, TNK002, and TNK003 Pressurized Horizontal Condensate Tanks with FLR001 and FLR002 in background.



PHOTOGRAPHER: Etcheverry **DATE TAKEN:** 7/19/2017 **PHOTO #:** 8
DESCRIPTION: HET001 1.706 MMBtu/hr Stabilizer Heater (indirect)



PHOTOGRAPHER: Etcheverry **DATE TAKEN:** 7/19/2017 **PHOTO #:** 9
DESCRIPTION: HET002 1.584 MMBtu/hr Fuel Gas Heater (indirect)



PHOTOGRAPHER: Etcheverry **DATE TAKEN:** 7/19/2017 **PHOTO #:** 10
DESCRIPTION: Left FLR002 Process Flare, middle two abandoned flares, right FLR001 Combustion Unit

PHOTOGRAPHER: Etcheverry **DATE TAKEN:** 7/19/2017 **PHOTO #:** 11
DESCRIPTION: PNE001 Pneumatic Controllers at Pipeline Gathering